Deposition of Mary Sanders

		_	
	Page 74 A. Yes.	1	Page 76 A. Right.
1		1	_
2	Q. Okay. Do you understand that, by signing	2	Q. Okay. Did she ever tell you that her chest
3	this, you're declaring that this is all truthful	3	hurt or anything?
4	information?	4	A. Yes.
5	A. Yes.	5	Q. It did. Did it hurt while she was taking
ı			_
6	Q. Okay. As and let's see. Could you	6	the drugs?
7	turn to page 2 for me, please? Under No. C here,	7	 A. I don't know. I just talked to her lately,
8	you've checked yes, that that you've claimed that	8	and she just always complains about her chest.
9	you've suffered bodily injury as a result of using	9	Q. Does she have the same problem that you do
10	Pondimin, Redux, or phentermine. Do you feel that	10	with the chest tightness?
•	·		
11	do you do you remember any of the names of those	11	A. Yes.
12	drugs: Pondimin, Redux, or phentermine?	12	Q. Do you know if she has any, like, sharp
13	A. I definitely I remember phentermine.	13	pains in her chest?
14	Q. Phentermine?	14	A. Yes.
15	A. I really I remember that.	15	Q. She does. Does she have any problems
ı			•
16	Q. And how do you remember that from?	16	other worse than what you have?
17	A. I think more more just talking to me	17	A. Yes.
18	and Brenda just talking about we was taking the pill.	18	Q. She does. Do you know what what are
19	Q. Uh-huh (Indicating yes).	19	those problems?
20	A. I just I don't know why I remember	20	A. Well, her chest, you know, headaches.
	- · · · · · · · · · · · · · · · · · · ·		
21	phentermine, but I remember, you know, that word.	21	Basically that.
22	Q. Okay. What you said you you and	22	Q. Okay. Do you know if any doctor has ever
23	Brenda are pretty close friends?	23	talked to her?
24	A. Yes.	24	A. No.
25	Q. Do you remember any conversations you and	25	Q. No. Okay. Let's see. Now, turn get
23	Q. Do you remember any conversations you and	23	Q. 110. Okay. Ect 3 Sec. 110W, tulli get
	Page 75		Page 77
1	Page 75	1	Page 77
1	Brenda had about taking diet drugs?	1	you to turn I'll have you to turn to page 7 for
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	Page 78		Page 80
1	A the time when I took it.	1	Q. Okay. All right.
2	Q. Well, did you have much success when you	2	A. No more than I just, you know, look at this
3	took them?	3	paper when you've got Pondimin or Redux or
4	A. No.	4	and the state of t
			Q. Right.
5	Q. No. Did you lose any weight?	5	A you know, phentermine.
6	A. No.	6	Q. Is is it possible that you never took
7	Q. No. Okay. I want to turn your attention	7	Pondimin, that you took something else?
8	to page 9 now. Under Section Section E, it	8	A. Well, I know I took two pills.
9	requests whether or not you've been prescribed any	9	Q. Okay.
10	medicine medications to use to control your	10	A. So
11	weight, and you've checked yes. And then, under the	11	Q. All right.
12	two pills you have down here, you have Pondimin and	12	
13		1	A. And then, you know, I look at them three.
i .	phentermine. And approximate usage, the date is	13	I know it's it had to be one of them three. But I
14	January 1999. Is January when you went over and saw	14	know it was two pills that I I took.
15	Dr. Henson?	15	Q. Okay.
16	A. Yes. I think it was January of '99.	16	A. And phentermine, I remembered that name.
17	Q. Okay. Is do these two dates and two	17	Q. Right. Okay. On if you'll turn to
18	medicines look look accurate to you?	18	turn to the next page, page 10. Are you do you
19	A. Yes. Phentermine is a definite, but I knew	19	do you ever drink alcohol, Ms. Sanders?
20	there was two. And I I put Pondimin because I	20	·
1	· · · · · · · · · · · · · · · · · · ·		A. Like once, maybe twice a month.
21	remember that little peach pill.	21	Q. Once or twice a month. Like do you
22	Q. Uh-huh (Indicating yes).	22	drink a lot when you drink or just a little?
23	 A. And I really wasn't really sure, was the 	23	A. No. Just one cooler.
24	name of it was it Pondimin.	24	Q. One cooler. Have you ever have you ever
25	Q. Uh-huh (Indicating yes).	25	smoked cigarettes?
	Page 79		Page 81
1	Page 79 A. I I wasn't really sure of it.	1	Page 81 A. No.
1 2	A. I I wasn't really sure of it.	1 2	A. No.
2	A. I I wasn't really sure of it.Q. Okay.	2	A. No.Q. Have you ever done any illegal drugs?
2	A. I I wasn't really sure of it.Q. Okay.A. I don't know why I put Pondimin, but I	2	A. No.Q. Have you ever done any illegal drugs?A. No.
2 3 4	 A. I I wasn't really sure of it. Q. Okay. A. I don't know why I put Pondimin, but I thought that, you know, might have been the pill. 	2 3 4	A. No.Q. Have you ever done any illegal drugs?A. No.Q. No. Okay. If you'll look at on page
2 3 4 5	 A. I I wasn't really sure of it. Q. Okay. A. I don't know why I put Pondimin, but I thought that, you know, might have been the pill. But I remembered the pill. 	2 3 4 5	 A. No. Q. Have you ever done any illegal drugs? A. No. Q. No. Okay. If you'll look at on page 10, on No. H here, it says, "To the best of your
2 3 4 5 6	 A. I I wasn't really sure of it. Q. Okay. A. I don't know why I put Pondimin, but I thought that, you know, might have been the pill. But I remembered the pill. Q. Okay. 	2 3 4 5 6	 A. No. Q. Have you ever done any illegal drugs? A. No. Q. No. Okay. If you'll look at on page 10, on No. H here, it says, "To the best of your knowledge, have you ever experienced any of the
2 3 4 5 6 7	 A. I I wasn't really sure of it. Q. Okay. A. I don't know why I put Pondimin, but I thought that, you know, might have been the pill. But I remembered the pill. Q. Okay. A. And I remember that that one color of 	2 3 4 5 6 7	 A. No. Q. Have you ever done any illegal drugs? A. No. Q. No. Okay. If you'll look at on page 10, on No. H here, it says, "To the best of your knowledge, have you ever experienced any of the following?" And you've checked yes by all of these
2 3 4 5 6	 A. I I wasn't really sure of it. Q. Okay. A. I don't know why I put Pondimin, but I thought that, you know, might have been the pill. But I remembered the pill. Q. Okay. 	2 3 4 5 6	 A. No. Q. Have you ever done any illegal drugs? A. No. Q. No. Okay. If you'll look at on page 10, on No. H here, it says, "To the best of your knowledge, have you ever experienced any of the
2 3 4 5 6 7	 A. I I wasn't really sure of it. Q. Okay. A. I don't know why I put Pondimin, but I thought that, you know, might have been the pill. But I remembered the pill. Q. Okay. A. And I remember that that one color of 	2 3 4 5 6 7	A. No. Q. Have you ever done any illegal drugs? A. No. Q. No. Okay. If you'll look at on page 10, on No. H here, it says, "To the best of your knowledge, have you ever experienced any of the following?" And you've checked yes by all of these categories except memory loss. And I'll just read
2 3 4 5 6 7 8	 A. I I wasn't really sure of it. Q. Okay. A. I don't know why I put Pondimin, but I thought that, you know, might have been the pill. But I remembered the pill. Q. Okay. A. And I remember that that one color of that pill. Q. Did anyone ever tell you that Pondimin was 	2 3 4 5 6 7 8 9	A. No. Q. Have you ever done any illegal drugs? A. No. Q. No. Okay. If you'll look at on page 10, on No. H here, it says, "To the best of your knowledge, have you ever experienced any of the following?" And you've checked yes by all of these categories except memory loss. And I'll just read through some of the categories: Shortness of breath
2 3 4 5 6 7 8 9	A. I I wasn't really sure of it. Q. Okay. A. I don't know why I put Pondimin, but I thought that, you know, might have been the pill. But I remembered the pill. Q. Okay. A. And I remember that that one color of that pill. Q. Did anyone ever tell you that Pondimin was a little peach pill?	2 3 4 5 6 7 8 9	A. No. Q. Have you ever done any illegal drugs? A. No. Q. No. Okay. If you'll look at on page 10, on No. H here, it says, "To the best of your knowledge, have you ever experienced any of the following?" And you've checked yes by all of these categories except memory loss. And I'll just read through some of the categories: Shortness of breath not associated with vigorous exercise; persistent or
2 3 4 5 6 7 8 9 10	A. I I wasn't really sure of it. Q. Okay. A. I don't know why I put Pondimin, but I thought that, you know, might have been the pill. But I remembered the pill. Q. Okay. A. And I remember that that one color of that pill. Q. Did anyone ever tell you that Pondimin was a little peach pill? A. No. Phentermine could have been the peach	2 3 4 5 6 7 8 9 10	A. No. Q. Have you ever done any illegal drugs? A. No. Q. No. Okay. If you'll look at on page 10, on No. H here, it says, "To the best of your knowledge, have you ever experienced any of the following?" And you've checked yes by all of these categories except memory loss. And I'll just read through some of the categories: Shortness of breath not associated with vigorous exercise; persistent or recurrent pain in your chest; irregular heartbeat,
2 3 4 5 6 7 8 9 10 11 12	A. I I wasn't really sure of it. Q. Okay. A. I don't know why I put Pondimin, but I thought that, you know, might have been the pill. But I remembered the pill. Q. Okay. A. And I remember that that one color of that pill. Q. Did anyone ever tell you that Pondimin was a little peach pill? A. No. Phentermine could have been the peach pill.	2 3 4 5 6 7 8 9 10 11	A. No. Q. Have you ever done any illegal drugs? A. No. Q. No. Okay. If you'll look at on page 10, on No. H here, it says, "To the best of your knowledge, have you ever experienced any of the following?" And you've checked yes by all of these categories except memory loss. And I'll just read through some of the categories: Shortness of breath not associated with vigorous exercise; persistent or recurrent pain in your chest; irregular heartbeat, palpitations; abnormal lack of energy; fainting,
2 3 4 5 6 7 8 9 10 11 12 13	A. I I wasn't really sure of it. Q. Okay. A. I don't know why I put Pondimin, but I thought that, you know, might have been the pill. But I remembered the pill. Q. Okay. A. And I remember that that one color of that pill. Q. Did anyone ever tell you that Pondimin was a little peach pill? A. No. Phentermine could have been the peach pill. Q. Okay.	2 3 4 5 6 7 8 9 10 11 12 13	A. No. Q. Have you ever done any illegal drugs? A. No. Q. No. Okay. If you'll look at on page 10, on No. H here, it says, "To the best of your knowledge, have you ever experienced any of the following?" And you've checked yes by all of these categories except memory loss. And I'll just read through some of the categories: Shortness of breath not associated with vigorous exercise; persistent or recurrent pain in your chest; irregular heartbeat, palpitations; abnormal lack of energy; fainting, dizziness, lightheaded; snoring; head pounding; sleep
2 3 4 5 6 7 8 9 10 11 12 13 14	A. I I wasn't really sure of it. Q. Okay. A. I don't know why I put Pondimin, but I thought that, you know, might have been the pill. But I remembered the pill. Q. Okay. A. And I remember that that one color of that pill. Q. Did anyone ever tell you that Pondimin was a little peach pill? A. No. Phentermine could have been the peach pill. Q. Okay. A. You know, I remember phentermine.	2 3 4 5 6 7 8 9 10 11 12 13 14	A. No. Q. Have you ever done any illegal drugs? A. No. Q. No. Okay. If you'll look at on page 10, on No. H here, it says, "To the best of your knowledge, have you ever experienced any of the following?" And you've checked yes by all of these categories except memory loss. And I'll just read through some of the categories: Shortness of breath not associated with vigorous exercise; persistent or recurrent pain in your chest; irregular heartbeat, palpitations; abnormal lack of energy; fainting, dizziness, lightheaded; snoring; head pounding; sleep apnea; swelling; and arthritis or joint pain. Is
2 3 4 5 6 7 8 9 10 11 12 13 14 15	A. I I wasn't really sure of it. Q. Okay. A. I don't know why I put Pondimin, but I thought that, you know, might have been the pill. But I remembered the pill. Q. Okay. A. And I remember that that one color of that pill. Q. Did anyone ever tell you that Pondimin was a little peach pill? A. No. Phentermine could have been the peach pill. Q. Okay. A. You know, I remember phentermine. And	2 3 4 5 6 7 8 9 10 11 12 13 14 15	A. No. Q. Have you ever done any illegal drugs? A. No. Q. No. Okay. If you'll look at on page 10, on No. H here, it says, "To the best of your knowledge, have you ever experienced any of the following?" And you've checked yes by all of these categories except memory loss. And I'll just read through some of the categories: Shortness of breath not associated with vigorous exercise; persistent or recurrent pain in your chest; irregular heartbeat, palpitations; abnormal lack of energy; fainting, dizziness, lightheaded; snoring; head pounding; sleep apnea; swelling; and arthritis or joint pain. Is that this pretty accurate? You you have
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A. I I wasn't really sure of it. Q. Okay. A. I don't know why I put Pondimin, but I thought that, you know, might have been the pill. But I remembered the pill. Q. Okay. A. And I remember that that one color of that pill. Q. Did anyone ever tell you that Pondimin was a little peach pill? A. No. Phentermine could have been the peach pill. Q. Okay. A. You know, I remember phentermine. And Q. Did you fill this out with the help of	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A. No. Q. Have you ever done any illegal drugs? A. No. Q. No. Okay. If you'll look at on page 10, on No. H here, it says, "To the best of your knowledge, have you ever experienced any of the following?" And you've checked yes by all of these categories except memory loss. And I'll just read through some of the categories: Shortness of breath not associated with vigorous exercise; persistent or recurrent pain in your chest; irregular heartbeat, palpitations; abnormal lack of energy; fainting, dizziness, lightheaded; snoring; head pounding; sleep apnea; swelling; and arthritis or joint pain. Is that this pretty accurate? You you have experienced all of those things?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A. I I wasn't really sure of it. Q. Okay. A. I don't know why I put Pondimin, but I thought that, you know, might have been the pill. But I remembered the pill. Q. Okay. A. And I remember that that one color of that pill. Q. Did anyone ever tell you that Pondimin was a little peach pill? A. No. Phentermine could have been the peach pill. Q. Okay. A. You know, I remember phentermine. And	2 3 4 5 6 7 8 9 10 11 12 13 14 15	A. No. Q. Have you ever done any illegal drugs? A. No. Q. No. Okay. If you'll look at on page 10, on No. H here, it says, "To the best of your knowledge, have you ever experienced any of the following?" And you've checked yes by all of these categories except memory loss. And I'll just read through some of the categories: Shortness of breath not associated with vigorous exercise; persistent or recurrent pain in your chest; irregular heartbeat, palpitations; abnormal lack of energy; fainting, dizziness, lightheaded; snoring; head pounding; sleep apnea; swelling; and arthritis or joint pain. Is that this pretty accurate? You you have
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A. I I wasn't really sure of it. Q. Okay. A. I don't know why I put Pondimin, but I thought that, you know, might have been the pill. But I remembered the pill. Q. Okay. A. And I remember that that one color of that pill. Q. Did anyone ever tell you that Pondimin was a little peach pill? A. No. Phentermine could have been the peach pill. Q. Okay. A. You know, I remember phentermine. And Q. Did you fill this out with the help of	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A. No. Q. Have you ever done any illegal drugs? A. No. Q. No. Okay. If you'll look at on page 10, on No. H here, it says, "To the best of your knowledge, have you ever experienced any of the following?" And you've checked yes by all of these categories except memory loss. And I'll just read through some of the categories: Shortness of breath not associated with vigorous exercise; persistent or recurrent pain in your chest; irregular heartbeat, palpitations; abnormal lack of energy; fainting, dizziness, lightheaded; snoring; head pounding; sleep apnea; swelling; and arthritis or joint pain. Is that this pretty accurate? You you have experienced all of those things? A. Yes.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A. I I wasn't really sure of it. Q. Okay. A. I don't know why I put Pondimin, but I thought that, you know, might have been the pill. But I remembered the pill. Q. Okay. A. And I remember that that one color of that pill. Q. Did anyone ever tell you that Pondimin was a little peach pill? A. No. Phentermine could have been the peach pill. Q. Okay. A. You know, I remember phentermine. And Q. Did you fill this out with the help of anyone, this fact sheet?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A. No. Q. Have you ever done any illegal drugs? A. No. Q. No. Okay. If you'll look at on page 10, on No. H here, it says, "To the best of your knowledge, have you ever experienced any of the following?" And you've checked yes by all of these categories except memory loss. And I'll just read through some of the categories: Shortness of breath not associated with vigorous exercise; persistent or recurrent pain in your chest; irregular heartbeat, palpitations; abnormal lack of energy; fainting, dizziness, lightheaded; snoring; head pounding; sleep apnea; swelling; and arthritis or joint pain. Is that this pretty accurate? You you have experienced all of those things? A. Yes. Q. Do any of those stand out above the rest as
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	 A. I I wasn't really sure of it. Q. Okay. A. I don't know why I put Pondimin, but I thought that, you know, might have been the pill. But I remembered the pill. Q. Okay. A. And I remember that that one color of that pill. Q. Did anyone ever tell you that Pondimin was a little peach pill? A. No. Phentermine could have been the peach pill. Q. Okay. A. You know, I remember phentermine. And Q. Did you fill this out with the help of anyone, this fact sheet? A. No. Q. Okay. Did anyone other I recognize 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A. No. Q. Have you ever done any illegal drugs? A. No. Q. No. Okay. If you'll look at on page 10, on No. H here, it says, "To the best of your knowledge, have you ever experienced any of the following?" And you've checked yes by all of these categories except memory loss. And I'll just read through some of the categories: Shortness of breath not associated with vigorous exercise; persistent or recurrent pain in your chest; irregular heartbeat, palpitations; abnormal lack of energy; fainting, dizziness, lightheaded; snoring; head pounding; sleep apnea; swelling; and arthritis or joint pain. Is that this pretty accurate? You you have experienced all of those things? A. Yes. Q. Do any of those stand out above the rest as far as problems that that you had?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	 A. I I wasn't really sure of it. Q. Okay. A. I don't know why I put Pondimin, but I thought that, you know, might have been the pill. But I remembered the pill. Q. Okay. A. And I remember that that one color of that pill. Q. Did anyone ever tell you that Pondimin was a little peach pill? A. No. Phentermine could have been the peach pill. Q. Okay. A. You know, I remember phentermine. And Q. Did you fill this out with the help of anyone, this fact sheet? A. No. Q. Okay. Did anyone other I recognize that Pondimin is written on this page, but do you 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. No. Q. Have you ever done any illegal drugs? A. No. Q. No. Okay. If you'll look at on page 10, on No. H here, it says, "To the best of your knowledge, have you ever experienced any of the following?" And you've checked yes by all of these categories except memory loss. And I'll just read through some of the categories: Shortness of breath not associated with vigorous exercise; persistent or recurrent pain in your chest; irregular heartbeat, palpitations; abnormal lack of energy; fainting, dizziness, lightheaded; snoring; head pounding; sleep apnea; swelling; and arthritis or joint pain. Is that this pretty accurate? You you have experienced all of those things? A. Yes. Q. Do any of those stand out above the rest as far as problems that that you had? A. Say it again.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. I I wasn't really sure of it. Q. Okay. A. I don't know why I put Pondimin, but I thought that, you know, might have been the pill. But I remembered the pill. Q. Okay. A. And I remember that that one color of that pill. Q. Did anyone ever tell you that Pondimin was a little peach pill? A. No. Phentermine could have been the peach pill. Q. Okay. A. You know, I remember phentermine. And Q. Did you fill this out with the help of anyone, this fact sheet? A. No. Q. Okay. Did anyone other I recognize that Pondimin is written on this page, but do you remember, is there any have you ever heard anyone	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. No. Q. Have you ever done any illegal drugs? A. No. Q. No. Okay. If you'll look at on page 10, on No. H here, it says, "To the best of your knowledge, have you ever experienced any of the following?" And you've checked yes by all of these categories except memory loss. And I'll just read through some of the categories: Shortness of breath not associated with vigorous exercise; persistent or recurrent pain in your chest; irregular heartbeat, palpitations; abnormal lack of energy; fainting, dizziness, lightheaded; snoring; head pounding; sleep apnea; swelling; and arthritis or joint pain. Is that this pretty accurate? You you have experienced all of those things? A. Yes. Q. Do any of those stand out above the rest as far as problems that that you had? A. Say it again. Q. Have any I'm sorry. Are any of these
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. I I wasn't really sure of it. Q. Okay. A. I don't know why I put Pondimin, but I thought that, you know, might have been the pill. But I remembered the pill. Q. Okay. A. And I remember that that one color of that pill. Q. Did anyone ever tell you that Pondimin was a little peach pill? A. No. Phentermine could have been the peach pill. Q. Okay. A. You know, I remember phentermine. And Q. Did you fill this out with the help of anyone, this fact sheet? A. No. Q. Okay. Did anyone other I recognize that Pondimin is written on this page, but do you remember, is there any have you ever heard anyone else ever talk about taking Pondimin	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. No. Q. Have you ever done any illegal drugs? A. No. Q. No. Okay. If you'll look at on page 10, on No. H here, it says, "To the best of your knowledge, have you ever experienced any of the following?" And you've checked yes by all of these categories except memory loss. And I'll just read through some of the categories: Shortness of breath not associated with vigorous exercise; persistent or recurrent pain in your chest; irregular heartbeat, palpitations; abnormal lack of energy; fainting, dizziness, lightheaded; snoring; head pounding; sleep apnea; swelling; and arthritis or joint pain. Is that this pretty accurate? You you have experienced all of those things? A. Yes. Q. Do any of those stand out above the rest as far as problems that that you had? A. Say it again. Q. Have any I'm sorry. Are any of these more severe than the others? Like, are the headaches
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. I I wasn't really sure of it. Q. Okay. A. I don't know why I put Pondimin, but I thought that, you know, might have been the pill. But I remembered the pill. Q. Okay. A. And I remember that that one color of that pill. Q. Did anyone ever tell you that Pondimin was a little peach pill? A. No. Phentermine could have been the peach pill. Q. Okay. A. You know, I remember phentermine. And Q. Did you fill this out with the help of anyone, this fact sheet? A. No. Q. Okay. Did anyone other I recognize that Pondimin is written on this page, but do you remember, is there any have you ever heard anyone else ever talk about taking Pondimin A. No.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. No. Q. Have you ever done any illegal drugs? A. No. Q. No. Okay. If you'll look at on page 10, on No. H here, it says, "To the best of your knowledge, have you ever experienced any of the following?" And you've checked yes by all of these categories except memory loss. And I'll just read through some of the categories: Shortness of breath not associated with vigorous exercise; persistent or recurrent pain in your chest; irregular heartbeat, palpitations; abnormal lack of energy; fainting, dizziness, lightheaded; snoring; head pounding; sleep apnea; swelling; and arthritis or joint pain. Is that this pretty accurate? You you have experienced all of those things? A. Yes. Q. Do any of those stand out above the rest as far as problems that that you had? A. Say it again. Q. Have any I'm sorry. Are any of these more severe than the others? Like, are the headaches worse than the lack of energy or
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	A. I I wasn't really sure of it. Q. Okay. A. I don't know why I put Pondimin, but I thought that, you know, might have been the pill. But I remembered the pill. Q. Okay. A. And I remember that that one color of that pill. Q. Did anyone ever tell you that Pondimin was a little peach pill? A. No. Phentermine could have been the peach pill. Q. Okay. A. You know, I remember phentermine. And Q. Did you fill this out with the help of anyone, this fact sheet? A. No. Q. Okay. Did anyone other I recognize that Pondimin is written on this page, but do you remember, is there any have you ever heard anyone else ever talk about taking Pondimin A. No. Q or used the word "Pondimin"?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	A. No. Q. Have you ever done any illegal drugs? A. No. Q. No. Okay. If you'll look at on page 10, on No. H here, it says, "To the best of your knowledge, have you ever experienced any of the following?" And you've checked yes by all of these categories except memory loss. And I'll just read through some of the categories: Shortness of breath not associated with vigorous exercise; persistent or recurrent pain in your chest; irregular heartbeat, palpitations; abnormal lack of energy; fainting, dizziness, lightheaded; snoring; head pounding; sleep apnea; swelling; and arthritis or joint pain. Is that this pretty accurate? You you have experienced all of those things? A. Yes. Q. Do any of those stand out above the rest as far as problems that that you had? A. Say it again. Q. Have any I'm sorry. Are any of these more severe than the others? Like, are the headaches worse than the lack of energy or A. Lack of energy and headaches.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. I I wasn't really sure of it. Q. Okay. A. I don't know why I put Pondimin, but I thought that, you know, might have been the pill. But I remembered the pill. Q. Okay. A. And I remember that that one color of that pill. Q. Did anyone ever tell you that Pondimin was a little peach pill? A. No. Phentermine could have been the peach pill. Q. Okay. A. You know, I remember phentermine. And Q. Did you fill this out with the help of anyone, this fact sheet? A. No. Q. Okay. Did anyone other I recognize that Pondimin is written on this page, but do you remember, is there any have you ever heard anyone else ever talk about taking Pondimin A. No.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. No. Q. Have you ever done any illegal drugs? A. No. Q. No. Okay. If you'll look at on page 10, on No. H here, it says, "To the best of your knowledge, have you ever experienced any of the following?" And you've checked yes by all of these categories except memory loss. And I'll just read through some of the categories: Shortness of breath not associated with vigorous exercise; persistent or recurrent pain in your chest; irregular heartbeat, palpitations; abnormal lack of energy; fainting, dizziness, lightheaded; snoring; head pounding; sleep apnea; swelling; and arthritis or joint pain. Is that this pretty accurate? You you have experienced all of those things? A. Yes. Q. Do any of those stand out above the rest as far as problems that that you had? A. Say it again. Q. Have any I'm sorry. Are any of these more severe than the others? Like, are the headaches worse than the lack of energy or

25

Q. No. Different test.

Deposition of Mary Sanders April 16, 2004

		Τ	······································
	Page 82	1 .	Page 84
1	A. I'm sorry.	1	A. Okay.
2	Q. What what about faintning fainting?	2	Q. EKG should did you did you see a
3	Have you ever fainted?	3	little slip with the EKG, kind of has your heart
4	A. No. I always get I get lightheaded.	4	rate printed on it?
5	Q. Get lightheaded? Do you get lightheaded	5	A. Yes.
6	on just do you do anything specifically when	6	Q. Okay. It's a it's echo is a
7	you get lightheaded?	7	different test. On page if you could, turn your
8	A. No. Only like, when I get tired,	8	attention to page 17. It actually starts at the end
9	shortness of breath, then I get lightheaded.	9	of page 16, under S. It asks you to a to complete
10	Q. Okay. Has any doctor ever told you that	10	the chart that's on the next page, and you've checked
11	you have sleep apnea?	11	mild under all four categories listed there for valve
12	A. No.	12	regurgitation?
13	Q. Have you ever woken up in the middle of the	13	A. Yes.
14	night and felt you couldn't breathe?	14	Q. Where did did you fill that out?
15	A. Yes.	15	A. Yes.
16	Q. Does that happen quite a bit?	16	Q. Do you where did you get the information
17	A. I won't say quite a bit. It's probably	17	from that led you to fill that out?
18	like every now and then.	18	A. Just looking at the sheet that I had.
19	Q. Okay.	19	Q. Looking at the echocardiogram report?
20	A. I won't just say	20	A. Yes.
21	Q. What what happens? Do you feel like	21	Q. Okay. And down here, also, on 17, there's
22	you're choking, or do you just wake up and you're	22	a in this box here under DIET DRUG USE, under both
23	panting?	23	Pondimin and phentermine, you've listed, also, once
24	A. And like yes. And I just cannot	24	again, 1-9 1 January 1999. And that
25	breathe, and chest hurts. That's it.	25	information is the same as it was on the other page,
23	breatile, and chest nurts. That's it.	2.5	
	Page 83		Page 85
1	Q. Are you how how long does that spell	1	isn't it?
2	last?	2	A. Yes.
3	A. Maybe like a couple of seconds.	3	Q. Okay. And Dr. Henson prescribed those for
4	Q. Okay. Now, you've checked, under No. 3	4	you?
5	here, irregular heartbeat, palpitations, tachycardia,		
6		5	
1 -		5	A. Yes.
17	or bradycardia. When you checked yes to that, which	6	A. Yes. Q. All right. Okay. Is that where you got
7 8	or bradycardia. When you checked yes to that, which one of those four were you checking yes to?	6 7	A. Yes. Q. All right. Okay. Is that where you got the that orange round pill there, is that where
8	or bradycardia. When you checked yes to that, which one of those four were you checking yes to? A. Irregular heartbeat.	6 7 8	A. Yes. Q. All right. Okay. Is that where you got the that orange round pill there, is that where you got the idea of Pondimin?
8 9	or bradycardia. When you checked yes to that, which one of those four were you checking yes to? A. Irregular heartbeat. Q. Irregular heartbeat. And has a doctor told	6 7 8 9	A. Yes. Q. All right. Okay. Is that where you got the that orange round pill there, is that where you got the idea of Pondimin? A. I think so, yes. I think so, yeah.
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25 that you had, any tax returns or anything?

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Page 86 Page 88 1 A. Well, first, by being a beautician, you're out? Do you remember filling this part of the --2 self employed. 2 A. Yes. O. Uh-huh (Indicating yes). 3 3 Q. If you turn back one page, you can see the 4 A. You know, you're allowed five years, you 4 front. You can see what -- what -- I guess this is a 5 know, for you -- to do your taxes. 5 separate form that's attached here. Do you -- do you 6 Q. Uh-huh (Indicating ves). remember filling this out? A. And I basically just started doing my taxes 7 7 A. Yes. 8 this year --8 Q. Is there a -- does it -- it appears that 9 9 Q. Okay. the address for Dr. Henson is the same as the Macon A. -- and last year. So --10 Primary Care physician. Is that just a mistake you 10 Q. So this is just kind of an estimate of how 11 11 made? 12 much vou made? 12 A. That's a mistake. 13 A. Yes. 13 O. Okav. Do vou remember Dr. Henson's address Q. All right. This -- what -- what would you 14 14 in Gordo? say your income has been from -- in 2002 and 2003, if 15 15 A. No. I just remember Gordo, Alabama. you can just take a guess? 16 Q. Okay. All right. And then, on -- on page 16 17 A. I'd say about --17 E -- oh, I'm sorry -- page 4, No. E. Keep going. 18 Q. Well, what did you file for, actually? 18 Under health care facilities or hospitals you've 19 A. For 6,000. received outpatient treatment on, under E, you listed 19 Q. 6,000? 20 20 Starkville hospital, Baptist hospital, and Noxubee 21 A. Yeah. Because I was just working weekends. 21 General. Do you remember -- now, we talked about you 22 Q. Uh-huh (Indicating yes). 22 going to -- to Baptist hospital? 23 A. You know, my husband is the bread winner, 23 A. Right. 24 24 so --Q. Do you remember any kind of emergency room 25 Q. All right. Okay. Is this -- now, is the 25 visit or outpatient treatment you would have had at Page 87 Page 89 income here representative of your combined incomes 1 Starkville hospital? 2 or just yours? 2 A. No. 3 A. Just mine. 3 Q. No. Okay. Is there any reason why you 4 O. Okay. listed that under here, then? A. I think I was -- I was just guessing them, 5 5 A. Starkville, you know, that's when I had my 6 you know, guessing. 6 baby. You know, it just asked about hospitals and 7 Q. Right. Okay. On -- I turn your attention 7 health care places. to page 2 -- oh, I'm sorry. Yeah. Keep going. I'm Q. Okay. All right. 8 8 sorry. It's -- it's probably more like page 26? 9 9 A. That's why I wrote that down. 10 MS. TOLLE: Just a second page 2. 10 Q. And then, why -- why did you put that 11 Q. (By Mr. Blount) Yeah. It would 11 Noxubee General, then? Did you -- did you ever go technically be page 26, but it's listed as page 2 on 12 12 there? this handout. You have a -- this is listing -- a 13 13 A. Yes. I have been there before. 14 listing of primary care physicians you've seen under 14 Q. Okay. Category B. At the top of page 2 here, you have Dr. 15 15 A. I don't remember what it was for, but I --Edmond Henson. Is that the same physician that 16 I have been there before. I just, you know, put them 17 prescribed you the diet drugs? 17 down since it asked. 18 A. Yes. 18 Q. Okay. Do you remember if were you sick or 19 Q. Okay. And his address here is listed as 19 hurt when you went there? 20 North Jefferson, Macon, Mississippi. Is that A. I was sick. 20 21 correct? Q. You were sick. Do you remember if it had 21 22 A. No. 22 anything to do with your heart hurting? 23 Q. That's not correct? 23 A. I don't remember. 24 A. No. Gordo, Alabama. 24 Q. Do you remember if you had to spend the 25 Q. It's in Gordo. Did -- did you fill this 25 night?

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		Т	
	Page 90		Page 92
	A. No.	1	there?
2	Q. Okay. It was just an ER visit?	2	A. No.
3	A. Yes.	3	Q. Do you know if it was diet drugs?
4	Q. Do you remember if you were terribly sick	4	A. I don't think so.
5	or just had the flu?	5	Q. Don't think so?
6	A. I didn't have the flu. I don't I don't	6	A. No.
7	remember. I know it wasn't the flu.	7	Q. Do you remember what doctor may have
8	Q. Okay. All right. Can you remember about	8	prescribed those prescribed that medicine for you?
9	when you would have gone to Noxubee? Would it have	9	A. Beverly Gardner or either Denzil Robertson.
10	been	10	You know, if I went there, it was one of them.
11	A. I don't remember.	11	Q. Okay. And you don't wouldn't remember
12	Q 10 years ago or five years ago?	12	what they would it have been any kind of heart
13	A. (No response).	13	medicine they gave you?
14	Q. Can't remember?	14	A. I don't think so. I don't remember.
15	A. I don't remember.	15	Q. Okay. And then, you've got Kmart Pharmacy
16	Q. Okay. All right. On page 7, if you'll	16	in Mobile, Alabama. That's where you had your diet
17	just keep going, under Category G, you were asked to	17	drugs prescribed?
18	list drug stores that you've used in the past 10	18	A. Yes.
19	years, and you listed B & O Drugs. And then, we	19	Q. Can you remember any other type of medicine
20	talked about this earlier. Can you remember any of	20	you would have had filled there?
21	the prescriptions you would have had filled there?	21	A. No.
22	A. No.	22	Q. No. Okay. Do you remember any other
23	Q. No. You've also listed Wal-Mart here. Did	23	pharmacies you may have gone to in Macon or
24	you get any prescriptions filled at the Wal-Mart in	24	A. No.
25	Macon?	25	Q Columbus?
	D 04		
1	Page 91 A. No. We don't have a Wal-Mart in Macon.	1	Page 93 A. Those are the only two.
2	Q. Uh-huh (Indicating yes).	2	Q. Okay. If you could, turn to the last two
3	A. I probably just got tired of filling this	3	pages of the fact sheet. The first page here is from
4	out. But I only went to B & O and Kmart.	4	B & O Pharmacy. Did you are these have you
5	Q. Okay. So you didn't go to Wal-Mart?	5	ever seen this before, this page?
6	A. No.	6	A. No.
7	Q. You never got a prescription filled at	7	Q. Did you do you remember maybe
8	Wal-Mart?	8	MR. BLOUNT: I'm sorry. Do you want a
9	A. I don't even know why I wrote that, because	9	copy of this?
10	Wal-Mart is not in Macon.	10	MS. TOLLE: Do you have a copy,
11	Q. Okay. Did you ever get a prescription	11	please?
12	filled at a Wal-Mart in another city?	12	MR. BLOUNT: Yeah, I do. I should.
13	A. No.	13	(After a discussion off the record,
14	Q. Okay. So you've never had a prescription	14	the deposition continued as follows:)
15	filled at Wal-Mart?	15	Q. (By Mr. Blount) So are you this is what
16	A. No.	16	appears to be it's got B & O Pharmacy written up
17	Q. Okay. So City Drugs is also listed here on	17	in the left-hand corner.
18	page 8?	18	A. Okay.
19	A. Uh-huh (Indicating yes).	19	Q. And it says, "PATIENT PRESCRIPTION SUMMARY"
20	Q. Have you ever had a prescription filled at	20	in the middle. Is that your name listed right there
21	City Drugs?	21	above on the second paragraph?
22	A. Yes.	22	A. Yes.
23	Q. You have. Is that and that's in Macon?	23	Q. What is that is that it says, "Mary
24	A. Yes, that's in Macon.	24	Mason Sanders, Route 1, Box 224, Macon, Mississippi"?
25	Q. Okay. Do you remember what you had filled	25	A. Yes.
Ľ	that you had fined		

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1			
1	Page 94		Page 96
1	Q. Is that an address you've lived at?	1	A. Yes. This is the time. I remember that
2	A. Yes.	2	amount.
3	Q. Okay. Is that would you have been	3	Q. Okay. It says says quantity of 30.
4	living there in and around 1998, 1999?	4	Does that does that look about right?
5	A. Yes.	5	A. Yes.
6	Q. Okay. Is that your correct phone number	6	Q. Did you take all 30 of those pills?
7	that you had at that address?	7	A. Yes.
8	A. Yes. Then, yes.	8	Q. Did you take did he ever give you
9	Q. Is it but it's not your correct phone	9	another prescription after that?
10	number now, though?	10	A. No. I never went back.
11	A. No.	11	Q. Never went back. Okay. When you took
12	Q. Okay.	12	those pills, did they help did they help your
13	A. Not the correct address now.	13	help your heart? Did the tightness go away?
14	Q. Okay. Is that now, is that the same	14	A. I don't remember.
15	place that you is that the same house; they just	15	Q. Don't remember. Okay. All right. Do you
16	changed the address?	16	remember can you think can you remember any
17	A. Well, I was staying with my mom	17	
18	the state of the s	18	other types of medicine you may have ever had
19			prescribed or that you would have bought at B & O
20		19	Pharmacy?
	Q. That's your mother's address?	20	A. No.
21	A. Right.	21	Q. No?
22	Q. Okay. I knew the date	22	A. No.
23	A. Well, I wasn't staying at my mom's. I	23	Q. So and do you you can't remember
24	think I just by me filling my prescriptions out, I	24	any any diet drugs you would have maybe gotten
25	never changed my address.	25	there?
١.	Page 95	l .	Page 97
1	Q. Okay. All right.	1	A. I didn't get any diet drugs there.
2	A. Even now it's probably still the same. I	2	Q. Okay. You can, then, turn to the next page
3	don't know.	3	for me. Up at the top this is says, "MEDICAL
		14	EXPENSES 01/01/1999 through 08/22/2002 " And it's
4	Q. Okay. Down here, listed on this summary,		EXPENSES, 01/01/1999 through 08/22/2002." And it's
5	is acetaminophen acetaminophen, hydrocodone, and	5	got "KMART PHARMACY" with a Mobile, Alabama, address.
5 6	is acetaminophen acetaminophen, hydrocodone, and what appears to be Remeron is what it looks like to	5 6	got "KMART PHARMACY" with a Mobile, Alabama, address. Do you remember being going to Mobile, Alabama,
5 6 7	is acetaminophen acetaminophen, hydrocodone, and what appears to be Remeron is what it looks like to me. Do you remember being prescribed any of these	5	got "KMART PHARMACY" with a Mobile, Alabama, address. Do you remember being going to Mobile, Alabama, and getting the diet drugs or getting drugs there
5 6 7 8	is acetaminophen acetaminophen, hydrocodone, and what appears to be Remeron is what it looks like to me. Do you remember being prescribed any of these drugs?	5 6	got "KMART PHARMACY" with a Mobile, Alabama, address. Do you remember being going to Mobile, Alabama, and getting the diet drugs or getting drugs there at their pharmacy?
5 6 7 8 9	is acetaminophen acetaminophen, hydrocodone, and what appears to be Remeron is what it looks like to me. Do you remember being prescribed any of these drugs? A. Dr. Pearson you know, in '98, that's	5 6 7	got "KMART PHARMACY" with a Mobile, Alabama, address. Do you remember being going to Mobile, Alabama, and getting the diet drugs or getting drugs there at their pharmacy? A. Yes.
5 6 7 8 9	is acetaminophen acetaminophen, hydrocodone, and what appears to be Remeron is what it looks like to me. Do you remember being prescribed any of these drugs? A. Dr. Pearson you know, in '98, that's when after I had my baby.	5 6 7 8	got "KMART PHARMACY" with a Mobile, Alabama, address. Do you remember being going to Mobile, Alabama, and getting the diet drugs or getting drugs there at their pharmacy?
5 6 7 8 9	is acetaminophen acetaminophen, hydrocodone, and what appears to be Remeron is what it looks like to me. Do you remember being prescribed any of these drugs? A. Dr. Pearson you know, in '98, that's when after I had my baby. Q. That's when you had your baby?	5 6 7 8 9	got "KMART PHARMACY" with a Mobile, Alabama, address. Do you remember being going to Mobile, Alabama, and getting the diet drugs or getting drugs there at their pharmacy? A. Yes. Q. Okay. Now, the drugs they have listed here are phentermine, 30 milligrams, and what appears to
5 6 7 8 9	is acetaminophen acetaminophen, hydrocodone, and what appears to be Remeron is what it looks like to me. Do you remember being prescribed any of these drugs? A. Dr. Pearson you know, in '98, that's when after I had my baby. Q. That's when you had your baby? A. Yes.	5 6 7 8 9	got "KMART PHARMACY" with a Mobile, Alabama, address. Do you remember being going to Mobile, Alabama, and getting the diet drugs or getting drugs there at their pharmacy? A. Yes. Q. Okay. Now, the drugs they have listed here
5 6 7 8 9 10 11	is acetaminophen acetaminophen, hydrocodone, and what appears to be Remeron is what it looks like to me. Do you remember being prescribed any of these drugs? A. Dr. Pearson you know, in '98, that's when after I had my baby. Q. That's when you had your baby?	5 6 7 8 9 10 11	got "KMART PHARMACY" with a Mobile, Alabama, address. Do you remember being going to Mobile, Alabama, and getting the diet drugs or getting drugs there at their pharmacy? A. Yes. Q. Okay. Now, the drugs they have listed here are phentermine, 30 milligrams, and what appears to
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5 6 7 8 9 10 11 12 13	is acetaminophen acetaminophen, hydrocodone, and what appears to be Remeron is what it looks like to me. Do you remember being prescribed any of these drugs? A. Dr. Pearson you know, in '98, that's when after I had my baby. Q. That's when you had your baby? A. Yes. Q. So he gave you okay. And so that's your that's your	5 6 7 8 9 10 11 12 13	got "KMART PHARMACY" with a Mobile, Alabama, address. Do you remember being going to Mobile, Alabama, and getting the diet drugs or getting drugs there at their pharmacy? A. Yes. Q. Okay. Now, the drugs they have listed here are phentermine, 30 milligrams, and what appears to be potassium chloride, 10 milligrams. I can't really read it very well, but do you do you see those
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5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	is acetaminophen acetaminophen, hydrocodone, and what appears to be Remeron is what it looks like to me. Do you remember being prescribed any of these drugs? A. Dr. Pearson you know, in '98, that's when after I had my baby. Q. That's when you had your baby? A. Yes. Q. So he gave you okay. And so that's your that's your A. Uh-huh (Indicating yes). Q OBGYN? A. In '98, that's when I got a tooth pulled. That's my dentist. Q. Okay. Dr. Wiygul; is that right? A. Right. And Dr. Robertson, this is when he prescribed me that medicine.	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	got "KMART PHARMACY" with a Mobile, Alabama, address. Do you remember being going to Mobile, Alabama, and getting the diet drugs or getting drugs there at their pharmacy? A. Yes. Q. Okay. Now, the drugs they have listed here are phentermine, 30 milligrams, and what appears to be potassium chloride, 10 milligrams. I can't really read it very well, but do you do you see those words on that page? A. Yes. Q. Okay. And this is prescribed by Dr. Henson; is that correct? A. Yes. Q. Okay. Do you remember getting those those medicines? A. Yes.
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	Page 98		Page 100
1	the the signature of the pharmacist, it says,	1	there was any difference on
2	"TAKE ONE TABLET BY MOUTH EVERY DAY FOR 30 DAYS."	2	Q. (By Mr. Blount) So have you ever have
3	And the one up above it, underneath the phentermine,	3	you ever talked to anybody about taking Pondimin? Do
4	says, "TAKE ONE CAPSULE BY MOUTH EVERY DAY FOR 21	4	you ever remember
5	DAYS."	5	A. No.
6	A. Okay.	6	Q anyone ever talking to you about it.
7	Q. Do you recall doing that, taking the	7	Have you ever heard anyone talk about fen-phen?
8	pills	8	A. No.
9	A. Yes.	9	Q. No. Have you ever heard anyone talk about
10	Q as those as those instructions.	10	any diet drugs, maybe a couple of years before you
11	Okay. And do you remember is this is this the	11	took them, being pulled from the market?
12	only prescription you would have had filled at that	12	A. No.
13	pharmacy, or did you get a second prescription filled	13	Q. Okay. So have you ever heard anyone say
14	there?	14	that Pondimin was pulled from the market in 1997?
15	A. I I don't remember. I remember just	15	A. No.
16	filling this prescription in.	16	Q. No. Or 1998, any of those years?
17	Q. Okay. And you saw Dr. Henson at least	17	A. No.
18	twice; is that correct?	18	Q. No, 1998. Okay. To the best of your
19	A. Yes. I if I'm not mistaken, I think it	19	knowledge, do you know do you know do you know
20	was twice.	20	if fen-phen the drug fen-phen was pulled from the
21	Q. Okay. Do you remember if you had	21	market?
22	prescriptions filled both times you went to see him?	22	A. Not that I know of. No. Not that I know
23	A. I don't remember.	23	of. I don't I don't know.
24	Q. Don't remember. Okay. Just for	24	Q. Okay. Are you as we sit here today, do
25	clarification, do you do you see where Pondimin	25	you think you took the the drug Pondimin?
	Page 99		Page 101
1	has been prescribed on either this page or on the	1	A. Well, I know it was just two pills. And
2	previous page?	2	you there were three options you gave me. So I
3	A. No. No. Like I said, I remember phentermine.	3	just took a educated guess that it might have been
5	Q. Okay.	4	Pondimin. I don't really remember I don't know
6	•	5	what he prescribed them. I took them in hopes of
7	A. And, you know, just by you giving me those	6 7	losing weight
8	three options, you know, while I was filling out this		Q. Okay. All right.
9	paper (indicating). Q. Right.	8	A to be honest.
10	A. So I just, you know, thought maybe it was	9 10	Q. All right.
11	Pondimin.	11	A. And they were just asking what pill is this, what pill is that.
12	Q. Okay.	12	Q. Okay.
13	MS. TOLLE: Do you have an original?	13	MR. BLOUNT: Can we take a recess?
14	I'm just looking	14	MS. TOLLE: Yes.
15	MR. BLOUNT: I think this is my	15	MR. BLOUNT: All right.
16	original.	16	MR. FORD: We're off the record. The
17	MS. TOLLE: Because the last line, it	17	time is 11:40 a.m.
18	looks like there's something under there that you	18	(After a recess, the deposition
19	cannot read. I don't know what it is.	19	continued as follows:)
20	MR. BLOUNT: This is the copy that was	20	MR. FORD: We're back on the record.
21	sent to me. The lines appear to	21	The time is 11:46 a.m.
22	MS. TOLLE: Okay.	22	Q. (By Mr. Blount) Okay, Ms. Sanders. You
23	MR. BLOUNT: go up and down the	23	said that you saw Ms Dr. Gardner in the last few
24	page, but	24	months; is that correct?
25	MS. TOLLE: I just didn't know if	25	A. Dr. Gardner? Yes.

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Page 102 Page 104 1 Q. Okay. Can you -- can you remember any 1 A. Tooth pulled. 2 other doctors you might have seen in the last 12 2 Q. You've had teeth pulled. When you go to 3 months? 3 the dentist, does -- have they ever -- have they ever 4 A. No. told you, you need to take antibiotics before you get 5 Q. Have you been to any health care facility, 5 your teeth cleaned? emergency room, or minor clinics in -- in the last 12 6 A. No. 7 Q. No. Okay. Have you ever seen a sign 7 months? 8 8 A. No. hanging in the dentist's office that says, if you 9 Q. No. Okay. And now, you did mention a 9 ever took diet drugs, to make sure you get an dentist earlier. Who is your dentist right now? antibiotic or make sure you tell them? 10 10 A. Same doctor. 11 11 A. No. 12 O. Same doctor? 12 Q. No. Okay. Well, before Dr. -- before Dr. 13 A. James Wiygul. 13 Robertson and -- I believe -- I believe you said you 14 Q. Wiygul is his last name? saw -- I believe -- well, the pharmacy records show 14 15 A. Uh-huh (Indicating yes). Wiygul. 15 1998, I believe. If you could look at those again. Q. Wiygul. Do you remember where his office It's the second to last page on Exhibit -- on --16 16 17 is? 17 on -- on this fact sheet. It says Dr. Denzil 18 A. In Columbus, Mississippi. 18 Robertson. And the date for that -- I'm sorry -- is 19 Q. Do you remember possibly where, what 19 1999? 20 street? 20 A. Yeah. 21 21 A. No. Q. Is that -- is that -- is that accurate, 22 Q. Do you know if he's got a -- what the name 22 that 3-02-99? Is that about the time you would have 23 of his office is? Is it Dr. Wiygul's office? I 23 seen him? mean -- what I mean is, does it -- does it have -- is 24 24 A. I don't remember. 25 he part of a group, a medical group? 25 Q. Don't remember. Can you remember any other Page 103 A. Well, his father's practice. 1 physician you've seen prior to seeing Dr. Robertson, 2 Q. Okay. 2 other than your OBGYN doctor, since you've been a -A. And I think it's -- if I'm not mistaken, I 3 3 since you've been a teenager, since you moved here? 4 think it's just his last name --4 A. No. 5 Q. Okay. 5 Q. No. Okay. And that prescription for A. -- you know, on the door. 6 6 Remeron that Dr. Robertson prescribed to you, you 7 O. All right. And how long have you been 7 only took that one prescription; is that correct? 8 seeing Dr. Wiygul? 8 A. Yes. 9 A. Since '98. 9 Q. Do you -- do you remember why you decided 10 Q. Since 1998. All right. Who did you see --10 not to take any more? did you see a dentist before him? 11 A. I just didn't have the money to keep making 11 A. No. 12 12 that doctor's visit. 13 Q. Okay. 13 Q. Okay. And he only gave you a prescription 14 A. Well, yes. 14 for one -- one-time prescription? Q. You did? 15 15 A. Yes. 16 A. Dr. Atkins in Macon, Mississippi. 16 Q. Okay. Have you ever taken any medicine for 17 Q. What did you see Dr. Atkins for, just for 17 anxiety? general cleanings? 18 18 A. No. 19 A. Yes. Q. Have you ever taken any medicine for 19 20 Q. Did you ever see Dr. Atkins for braces or 20 depression? 21 anything? 21 A. No. 22 A. No. 22 Q. Okay. Have you ever -- have you ever felt 23 Q. Okay. Did you ever -- did -- now, with Dr. 23 that you might be depressed? 24 Wiygul, have you only gone for cleanings, or have you 24 A. No. had any major work done? 25 Q. Okay. Good. I'm going to go through a

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	Page 106		Page 108
1	list of tests here. I just want you to tell me	1	A. I don't remember.
2	whether or not you know if you've had that test?	2	Q. Okay.
3	A. Okay.	3	A. I don't recall.
4	Q. An electrocardiogram?	4	Q. Okay. Do you know if you have any
5	A. I don't know.	5	appointment scheduled in the future to have an
6 7	Q. Okay. Chest X-ray?	6	echocardiogram done?
8	A. Yes.	7 8	A. No.
9	Q. Is that when you were in the hospital inA. Baptist Memorial.	9	Q. No. Okay. Do you have any appointment scheduled in the future to see a doctor?
10	Q Baptist Memorial?	10	A. Only when I need to.
11	A. Yes.	11	Q. Only when you need to. Have you ever
12	Q. Have you ever had a chest X-ray other than	12	smoked?
13	that?	13	A. No.
14	A. Not that I can remember.	14	Q. Okay. I need to go we need to go over
15	Q. Okay. Has anyone ever given you what's	15	some family medical history with you. Are your
16	called an exercise test or stress test?	16	parents both still alive?
17	A. No.	17	A. Yes.
18	Q. Put you on a treadmill with little leads or	18	Q. They are. Are they what your mom's
19	anything?	19	name?
20	A. No.	20	A. Edna Mason, E-D-N-A.
21	Q. No. Okay. Have you ever heard doctors	21	Q. Okay. And where does she live?
22	tell you that they're giving you a pulmonary function	22	A. Macon, Mississippi.
23	test or a test on your heart I mean test on your	23	Q. Are y'all pretty close?
24	lungs?	24	A. Yes.
25	A. No.	25	Q. See each other quite a bit?
	Page 107		D 100
1	Q. Okay. Have you ever heard any any	1	A. Every day.
2	any physician ever tell you they're testing your		
3		2	
י ו	lungs for anything?	2	Q. Every day. Does she know that you're
4	lungs for anything? A. No.	2 3 4	Q. Every day. Does she know that you're involved in this litigation?
1 .		3	Q. Every day. Does she know that you're involved in this litigation? A. Yes.
4	A. No.	3 4	Q. Every day. Does she know that you're involved in this litigation? A. Yes.
4 5	A. No. Q. Okay. When you went to see when you went to Columbus and went to the Landmark Hotel and Dr. Tai did the echocardiogram, do you remember if	3 4 5	Q. Every day. Does she know that you're involved in this litigation?A. Yes.Q. Okay. Have you ever talked to her about
4 5 6 7 8	A. No. Q. Okay. When you went to see when you went to Columbus and went to the Landmark Hotel and Dr. Tai did the echocardiogram, do you remember if you were having any chest problems that day, or had	3 4 5 6	Q. Every day. Does she know that you're involved in this litigation?A. Yes.Q. Okay. Have you ever talked to her about it?
4 5 6 7 8 9	A. No. Q. Okay. When you went to see when you went to Columbus and went to the Landmark Hotel and Dr. Tai did the echocardiogram, do you remember if you were having any chest problems that day, or had you been having any recently?	3 4 5 6 7 8 9	Q. Every day. Does she know that you're involved in this litigation? A. Yes. Q. Okay. Have you ever talked to her about it? A. No. Q. Okay. Does she know you're here doing a deposition today?
4 5 6 7 8 9	A. No. Q. Okay. When you went to see when you went to Columbus and went to the Landmark Hotel and Dr. Tai did the echocardiogram, do you remember if you were having any chest problems that day, or had you been having any recently? A. Well, I I had some recently.	3 4 5 6 7 8 9	Q. Every day. Does she know that you're involved in this litigation? A. Yes. Q. Okay. Have you ever talked to her about it? A. No. Q. Okay. Does she know you're here doing a deposition today? A. Yes.
4 5 6 7 8 9 10 11	A. No. Q. Okay. When you went to see when you went to Columbus and went to the Landmark Hotel and Dr. Tai did the echocardiogram, do you remember if you were having any chest problems that day, or had you been having any recently? A. Well, I I had some recently. Q. You had you'd had some prior	3 4 5 6 7 8 9 10	Q. Every day. Does she know that you're involved in this litigation? A. Yes. Q. Okay. Have you ever talked to her about it? A. No. Q. Okay. Does she know you're here doing a deposition today? A. Yes. Q. Does she know that you took diet drugs?
4 5 6 7 8 9 10 11	A. No. Q. Okay. When you went to see when you went to Columbus and went to the Landmark Hotel and Dr. Tai did the echocardiogram, do you remember if you were having any chest problems that day, or had you been having any recently? A. Well, I I had some recently. Q. You had you'd had some prior A. I probably was that day. I don't remember.	3 4 5 6 7 8 9 10 11 12	Q. Every day. Does she know that you're involved in this litigation? A. Yes. Q. Okay. Have you ever talked to her about it? A. No. Q. Okay. Does she know you're here doing a deposition today? A. Yes. Q. Does she know that you took diet drugs? A. Yes.
4 5 6 7 8 9 10 11 12	A. No. Q. Okay. When you went to see when you went to Columbus and went to the Landmark Hotel and Dr. Tai did the echocardiogram, do you remember if you were having any chest problems that day, or had you been having any recently? A. Well, I I had some recently. Q. You had you'd had some prior A. I probably was that day. I don't remember. Q. Okay.	3 4 5 6 7 8 9 10 11 12 13	Q. Every day. Does she know that you're involved in this litigation? A. Yes. Q. Okay. Have you ever talked to her about it? A. No. Q. Okay. Does she know you're here doing a deposition today? A. Yes. Q. Does she know that you took diet drugs? A. Yes. Q. Does she know when you were taking them,
4 5 6 7 8 9 10 11 12 13	 A. No. Q. Okay. When you went to see when you went to Columbus and went to the Landmark Hotel and Dr. Tai did the echocardiogram, do you remember if you were having any chest problems that day, or had you been having any recently? A. Well, I I had some recently. Q. You had you'd had some prior A. I probably was that day. I don't remember. Q. Okay. A. I don't remember. 	3 4 5 6 7 8 9 10 11 12 13 14	Q. Every day. Does she know that you're involved in this litigation? A. Yes. Q. Okay. Have you ever talked to her about it? A. No. Q. Okay. Does she know you're here doing a deposition today? A. Yes. Q. Does she know that you took diet drugs? A. Yes. Q. Does she know when you were taking them, that you took that you were on them?
4 5 6 7 8 9 10 11 12 13 14 15	 A. No. Q. Okay. When you went to see when you went to Columbus and went to the Landmark Hotel and Dr. Tai did the echocardiogram, do you remember if you were having any chest problems that day, or had you been having any recently? A. Well, I I had some recently. Q. You had you'd had some prior A. I probably was that day. I don't remember. Q. Okay. A. I don't remember. Q. All right. And you've never discussed that 	3 4 5 6 7 8 9 10 11 12 13 14 15	Q. Every day. Does she know that you're involved in this litigation? A. Yes. Q. Okay. Have you ever talked to her about it? A. No. Q. Okay. Does she know you're here doing a deposition today? A. Yes. Q. Does she know that you took diet drugs? A. Yes. Q. Does she know when you were taking them, that you took that you were on them? A. Yes.
4 5 6 7 8 9 10 11 12 13 14 15 16	A. No. Q. Okay. When you went to see when you went to Columbus and went to the Landmark Hotel and Dr. Tai did the echocardiogram, do you remember if you were having any chest problems that day, or had you been having any recently? A. Well, I I had some recently. Q. You had you'd had some prior A. I probably was that day. I don't remember. Q. Okay. A. I don't remember. Q. All right. And you've never discussed that echocardiogram with any other doctors; is that	3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q. Every day. Does she know that you're involved in this litigation? A. Yes. Q. Okay. Have you ever talked to her about it? A. No. Q. Okay. Does she know you're here doing a deposition today? A. Yes. Q. Does she know that you took diet drugs? A. Yes. Q. Does she know when you were taking them, that you took that you were on them? A. Yes. Q. Okay. Did she does your did your
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4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A. No. Q. Okay. When you went to see when you went to Columbus and went to the Landmark Hotel and Dr. Tai did the echocardiogram, do you remember if you were having any chest problems that day, or had you been having any recently? A. Well, I I had some recently. Q. You had you'd had some prior A. I probably was that day. I don't remember. Q. Okay. A. I don't remember. Q. All right. And you've never discussed that echocardiogram with any other doctors; is that A. No. Q. Do you remember if Dr. Tai told you he wanted to see you again, wanted a follow-up visit?	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Q. Every day. Does she know that you're involved in this litigation? A. Yes. Q. Okay. Have you ever talked to her about it? A. No. Q. Okay. Does she know you're here doing a deposition today? A. Yes. Q. Does she know that you took diet drugs? A. Yes. Q. Does she know when you were taking them, that you took that you were on them? A. Yes. Q. Okay. Did she does your did your mother ever take diet drugs? A. No. Q. No. Okay. Okay. Is your mom in pretty
4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. No. Q. Okay. When you went to see when you went to Columbus and went to the Landmark Hotel and Dr. Tai did the echocardiogram, do you remember if you were having any chest problems that day, or had you been having any recently? A. Well, I I had some recently. Q. You had you'd had some prior A. I probably was that day. I don't remember. Q. Okay. A. I don't remember. Q. All right. And you've never discussed that echocardiogram with any other doctors; is that A. No. Q. Do you remember if Dr. Tai told you he wanted to see you again, wanted a follow-up visit? A. Who is that?	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. Every day. Does she know that you're involved in this litigation? A. Yes. Q. Okay. Have you ever talked to her about it? A. No. Q. Okay. Does she know you're here doing a deposition today? A. Yes. Q. Does she know that you took diet drugs? A. Yes. Q. Does she know when you were taking them, that you took that you were on them? A. Yes. Q. Okay. Did she does your did your mother ever take diet drugs? A. No. Q. No. Okay. Okay. Is your mom in pretty good health?
4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. No. Q. Okay. When you went to see when you went to Columbus and went to the Landmark Hotel and Dr. Tai did the echocardiogram, do you remember if you were having any chest problems that day, or had you been having any recently? A. Well, I I had some recently. Q. You had you'd had some prior A. I probably was that day. I don't remember. Q. Okay. A. I don't remember. Q. All right. And you've never discussed that echocardiogram with any other doctors; is that A. No. Q. Do you remember if Dr. Tai told you he wanted to see you again, wanted a follow-up visit?	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. Every day. Does she know that you're involved in this litigation? A. Yes. Q. Okay. Have you ever talked to her about it? A. No. Q. Okay. Does she know you're here doing a deposition today? A. Yes. Q. Does she know that you took diet drugs? A. Yes. Q. Does she know when you were taking them, that you took that you were on them? A. Yes. Q. Okay. Did she does your did your mother ever take diet drugs? A. No. Q. No. Okay. Okay. Is your mom in pretty good health? A. Yes.
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4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. No. Q. Okay. When you went to see when you went to Columbus and went to the Landmark Hotel and Dr. Tai did the echocardiogram, do you remember if you were having any chest problems that day, or had you been having any recently? A. Well, I I had some recently. Q. You had you'd had some prior A. I probably was that day. I don't remember. Q. Okay. A. I don't remember. Q. All right. And you've never discussed that echocardiogram with any other doctors; is that A. No. Q. Do you remember if Dr. Tai told you he wanted to see you again, wanted a follow-up visit? A. Who is that? Q. I'm sorry. The the the person that gave you the echocardiogram in Columbus, that doctor.	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. Every day. Does she know that you're involved in this litigation? A. Yes. Q. Okay. Have you ever talked to her about it? A. No. Q. Okay. Does she know you're here doing a deposition today? A. Yes. Q. Does she know that you took diet drugs? A. Yes. Q. Does she know when you were taking them, that you took that you were on them? A. Yes. Q. Okay. Did she does your did your mother ever take diet drugs? A. No. Q. No. Okay. Okay. Is your mom in pretty good health? A. Yes. Q. Do you know of any health problems she has, any serious health problems?
4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. No. Q. Okay. When you went to see when you went to Columbus and went to the Landmark Hotel and Dr. Tai did the echocardiogram, do you remember if you were having any chest problems that day, or had you been having any recently? A. Well, I I had some recently. Q. You had you'd had some prior A. I probably was that day. I don't remember. Q. Okay. A. I don't remember. Q. All right. And you've never discussed that echocardiogram with any other doctors; is that A. No. Q. Do you remember if Dr. Tai told you he wanted to see you again, wanted a follow-up visit? A. Who is that? Q. I'm sorry. The the the person that gave you the echocardiogram in Columbus, that doctor. Did he tell you he wanted	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. Every day. Does she know that you're involved in this litigation? A. Yes. Q. Okay. Have you ever talked to her about it? A. No. Q. Okay. Does she know you're here doing a deposition today? A. Yes. Q. Does she know that you took diet drugs? A. Yes. Q. Does she know when you were taking them, that you took that you were on them? A. Yes. Q. Okay. Did she does your did your mother ever take diet drugs? A. No. Q. No. Okay. Okay. Is your mom in pretty good health? A. Yes. Q. Do you know of any health problems she has,

Deposition of Mary Sanders

1 2		т	
	Page 110		Page 112
1 2	Q. Diabetic. Do you know if she's ever had	1	
2	any kind of complications, like a stroke or anything,	2	Q. Okay. Do you have any brothers?
3	from her diabetes?	3	B A. Yes.
4	A. No.	4	
5	Q. Do you know if she has any has high	5	A. Anthony Brown.
6	blood pressure or maybe high cholesterol or anything?	6	Q. Brown is his last name?
7	A. No.	7	
8	Q. Do you know if she has any kidney problems?	8	Q. Okay. And it's just just one brother?
9	A. No.	9	A. Well, I have a half brother.
10	Q. No. Okay. Any other problems she has	10	,
11	except diabetes?	11	
12	A. No. That's it.	12	
13	Q. Okay. Are they just do you know if the	13	,
14	diabetes are excuse me real bad, or if	14	,
15	they're	15	, , , , , , , , , , , , , , , , , , , ,
16	A. Well, they're not bad. She's never been	16	5
17	hospitalized for them	17	
18	Q. Okay.	18	•
19	A or anything like that.	19	,
20	Q. About how old is your mom?	20	
21	A. Fifty-five.	21	,
22	Q. Fifty-five. Okay. And your father is	22	, , , , , , , , , , , , , , , , , , , ,
23	still still with us?	23	•
24	A. Yes.	24	
25	Q. What's his name?	25	Q. Okay. How old is he?
		<u> </u>	
,	Page 111 A. Ezeli Mason.		Page 113
1 2	Q. Does he also live in Macon?	1	•
3	A. Yes.	2	, , , , , , , , , , , , , , , , , , , ,
4	Q. Does he have any Mr. Mason have any	3	either Anthony or Will?
	- · · · · · · · · · · · · · · · · · · ·	ד ו	A Voc.
	neart problems or 1'm sorry health problems?	5	
5	heart problems or, I'm sorry health problems?	5	Q. Close to both of them?
5 6	A. He just found out a couple of months ago	6	Q. Close to both of them? A. Yes.
5 6 7	A. He just found out a couple of months ago that he's a diabetic.	6 7	Q. Close to both of them?A. Yes.Q. Do y'all see each other quite a bit?
5 6 7 8	A. He just found out a couple of months ago that he's a diabetic.Q. He's a diabetic. Have you ever been tested	6 7 8	Q. Close to both of them?A. Yes.Q. Do y'all see each other quite a bit?A. Every day.
5 6 7 8 9	A. He just found out a couple of months ago that he's a diabetic.Q. He's a diabetic. Have you ever been tested for diabetes?	6 7 8 9	Q. Close to both of them?A. Yes.Q. Do y'all see each other quite a bit?A. Every day.Q. Every day. That's pretty good. Do they
5 6 7 8 9	A. He just found out a couple of months ago that he's a diabetic.Q. He's a diabetic. Have you ever been tested for diabetes?A. No.	6 7 8 9	Q. Close to both of them? A. Yes. Q. Do y'all see each other quite a bit? A. Every day. Q. Every day. That's pretty good. Do they know you're involved in this litigation?
5 6 7 8 9 10 11	A. He just found out a couple of months ago that he's a diabetic. Q. He's a diabetic. Have you ever been tested for diabetes? A. No. Q. No. Okay. How old is your father?	6 7 8 9 10 11	Q. Close to both of them? A. Yes. Q. Do y'all see each other quite a bit? A. Every day. Q. Every day. That's pretty good. Do they know you're involved in this litigation? A. No.
5 6 7 8 9	 A. He just found out a couple of months ago that he's a diabetic. Q. He's a diabetic. Have you ever been tested for diabetes? A. No. Q. No. Okay. How old is your father? A. He's 53. 	6 7 8 9 10 11 12	Q. Close to both of them? A. Yes. Q. Do y'all see each other quite a bit? A. Every day. Q. Every day. That's pretty good. Do they know you're involved in this litigation? A. No. Q. No. Okay. What about your father?
5 6 7 8 9 10 11 12	A. He just found out a couple of months ago that he's a diabetic. Q. He's a diabetic. Have you ever been tested for diabetes? A. No. Q. No. Okay. How old is your father? A. He's 53. Q. Fifty-three. Trust me, if you ask me about	6 7 8 9 10 11 12 13	Q. Close to both of them? A. Yes. Q. Do y'all see each other quite a bit? A. Every day. Q. Every day. That's pretty good. Do they know you're involved in this litigation? A. No. Q. No. Okay. What about your father? A. Yes.
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5 6 7 8 9 10 11 12 13 14	A. He just found out a couple of months ago that he's a diabetic. Q. He's a diabetic. Have you ever been tested for diabetes? A. No. Q. No. Okay. How old is your father? A. He's 53. Q. Fifty-three. Trust me, if you ask me about my parents, I wouldn't get it either. Now, does Mr. Mason have any other problems? Does he have any	6 7 8 9 10 11 12 13 14 15	Q. Close to both of them? A. Yes. Q. Do y'all see each other quite a bit? A. Every day. Q. Every day. That's pretty good. Do they know you're involved in this litigation? A. No. Q. No. Okay. What about your father? A. Yes. Q. He does know that you're involved in the litigation?
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5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A. He just found out a couple of months ago that he's a diabetic. Q. He's a diabetic. Have you ever been tested for diabetes? A. No. Q. No. Okay. How old is your father? A. He's 53. Q. Fifty-three. Trust me, if you ask me about my parents, I wouldn't get it either. Now, does Mr. Mason have any other problems? Does he have any high blood pressure? A. No. Q. Heart are there any heart problems or lung problems?	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. Close to both of them? A. Yes. Q. Do y'all see each other quite a bit? A. Every day. Q. Every day. That's pretty good. Do they know you're involved in this litigation? A. No. Q. No. Okay. What about your father? A. Yes. Q. He does know that you're involved in the litigation? A. Yes. Q. Okay. (After a discussion off the record, the deposition continued as follows:) Q. (By Mr. Blount) Do either do either of
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. He just found out a couple of months ago that he's a diabetic. Q. He's a diabetic. Have you ever been tested for diabetes? A. No. Q. No. Okay. How old is your father? A. He's 53. Q. Fifty-three. Trust me, if you ask me about my parents, I wouldn't get it either. Now, does Mr. Mason have any other problems? Does he have any high blood pressure? A. No. Q. Heart are there any heart problems or lung problems? A. No.	6 7 8 9 10 11 12 13 14 15 16 17 18	Q. Close to both of them? A. Yes. Q. Do y'all see each other quite a bit? A. Every day. Q. Every day. That's pretty good. Do they know you're involved in this litigation? A. No. Q. No. Okay. What about your father? A. Yes. Q. He does know that you're involved in the litigation? A. Yes. Q. Okay. (After a discussion off the record, the deposition continued as follows:) Q. (By Mr. Blount) Do either do either of your children have any health problems?
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. He just found out a couple of months ago that he's a diabetic. Q. He's a diabetic. Have you ever been tested for diabetes? A. No. Q. No. Okay. How old is your father? A. He's 53. Q. Fifty-three. Trust me, if you ask me about my parents, I wouldn't get it either. Now, does Mr. Mason have any other problems? Does he have any high blood pressure? A. No. Q. Heart are there any heart problems or lung problems? A. No. Q. Have either of your parents ever had	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. Close to both of them? A. Yes. Q. Do y'all see each other quite a bit? A. Every day. Q. Every day. That's pretty good. Do they know you're involved in this litigation? A. No. Q. No. Okay. What about your father? A. Yes. Q. He does know that you're involved in the litigation? A. Yes. Q. Okay. (After a discussion off the record, the deposition continued as follows:) Q. (By Mr. Blount) Do either do either of your children have any health problems? A. No.
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. He just found out a couple of months ago that he's a diabetic. Q. He's a diabetic. Have you ever been tested for diabetes? A. No. Q. No. Okay. How old is your father? A. He's 53. Q. Fifty-three. Trust me, if you ask me about my parents, I wouldn't get it either. Now, does Mr. Mason have any other problems? Does he have any high blood pressure? A. No. Q. Heart are there any heart problems or lung problems? A. No. Q. Have either of your parents ever had cancer?	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. Close to both of them? A. Yes. Q. Do y'all see each other quite a bit? A. Every day. Q. Every day. That's pretty good. Do they know you're involved in this litigation? A. No. Q. No. Okay. What about your father? A. Yes. Q. He does know that you're involved in the litigation? A. Yes. Q. Okay. (After a discussion off the record, the deposition continued as follows:) Q. (By Mr. Blount) Do either do either of your children have any health problems? A. No. Q. No. They're good, healthy kids?
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. He just found out a couple of months ago that he's a diabetic. Q. He's a diabetic. Have you ever been tested for diabetes? A. No. Q. No. Okay. How old is your father? A. He's 53. Q. Fifty-three. Trust me, if you ask me about my parents, I wouldn't get it either. Now, does Mr. Mason have any other problems? Does he have any high blood pressure? A. No. Q. Heart are there any heart problems or lung problems? A. No. Q. Have either of your parents ever had cancer? A. No.	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. Close to both of them? A. Yes. Q. Do y'all see each other quite a bit? A. Every day. Q. Every day. That's pretty good. Do they know you're involved in this litigation? A. No. Q. No. Okay. What about your father? A. Yes. Q. He does know that you're involved in the litigation? A. Yes. Q. Okay. (After a discussion off the record, the deposition continued as follows:) Q. (By Mr. Blount) Do either do either of your children have any health problems? A. No. Q. No. They're good, healthy kids? A. Yes.

Deposition of Mary Sanders

F		Τ-	
,	Page 114	1 .	Page 116
	A. Yeah.		Q. Has lupus. Is this a first cousin?
3	Q. All right. Are your grandparents still with us?	2	A. First cousin.
4	A. No.	3	Q. First cousin. Is this on your mom or dad's
5	Q. No. All both sides are passed away?	5	side?
6	A. Yes.	6	A. Mom. Q. Mom. Okay. Is she is she able to keep
7	Q. Do you do you remember what your mom's	7	Q. Mom. Okay. Is she is she able to keep it under control?
8	parents might have passed away from?	8	A. Well, she's been sick yeah well,
9	A. If I'm not mistaken, the two of them died	9	she's in and out.
10	of natural causes.	10	Q. In and out. Okay. Anybody else have
11	Q. They both died of natural causes?	11	diabetes besides your parents?
12	A. Yeah.	12	A. Sister.
13	Q. Were they were they quite old?	13	Q. Your sister has diabetes?
14	A. Yeah. Yes, they were.	14	A. Yeah.
15	Q. All right. Do you remember if do you	15	Q. That's right. Sister. Thanks for
16	remember if either anybody ever talking about them	16	reminding me. What's your sister's name?
17	having health problems, having Granddad had high	17	A. Tonya Lewis.
18	blood pressure or	18	Q. And you have more than one sister, don't
19	A. No.	19	you?
20	Q Grandma had a stroke or anything?	20	A. Yes.
21	A. No.	21	Q. Okay. Your sister Tonya has diabetes. How
22	Q. No. Do do you know of any health	22	old is she?
23	problems that run on her side of the family, that a	23	A. She's 29.
24	lot of cousins may have?	24	Q. Twenty-nine. Does she have take insulin
25	A. No.	25	shots, or does she take pills?
	Page 115		Page 117
1	Page 115 O. No. What about your what about your	1	Page 117 A. Pills.
1 2	Q. No. What about your what about your	1 2	A. Pills.
	Q. No. What about your what about your father's parents?	2	
2	Q. No. What about your what about your		A. Pills. Q. Pills. Do either of your parents take
2	Q. No. What about your what about your father's parents? A. Grandfather died of cancer, and I think	2	A. Pills. Q. Pills. Do either of your parents take shots? A. Pills.
2 3 4	Q. No. What about your what about your father's parents? A. Grandfather died of cancer, and I think Grandmother died of natural causes, also.	2 3 4	A. Pills. Q. Pills. Do either of your parents take shots? A. Pills.
2 3 4 5	 Q. No. What about your what about your father's parents? A. Grandfather died of cancer, and I think Grandmother died of natural causes, also. Q. Natural causes. Do you remember what kind of cancer he had? A. I don't remember. 	2 3 4 5	A. Pills.Q. Pills. Do either of your parents take shots?A. Pills.Q. They both take pills?
2 3 4 5 6	 Q. No. What about your what about your father's parents? A. Grandfather died of cancer, and I think Grandmother died of natural causes, also. Q. Natural causes. Do you remember what kind of cancer he had? A. I don't remember. Q. Don't remember. 	2 3 4 5 6	 A. Pills. Q. Pills. Do either of your parents take shots? A. Pills. Q. They both take pills? A. Uh-huh (Indicating yes).
2 3 4 5 6 7 8 9	 Q. No. What about your what about your father's parents? A. Grandfather died of cancer, and I think Grandmother died of natural causes, also. Q. Natural causes. Do you remember what kind of cancer he had? A. I don't remember. Q. Don't remember. A. Unh-unh (Indicating no). 	2 3 4 5 6 7	 A. Pills. Q. Pills. Do either of your parents take shots? A. Pills. Q. They both take pills? A. Uh-huh (Indicating yes). Q. Okay. How long has how long has she
2 3 4 5 6 7 8 9	Q. No. What about your what about your father's parents? A. Grandfather died of cancer, and I think Grandmother died of natural causes, also. Q. Natural causes. Do you remember what kind of cancer he had? A. I don't remember. Q. Don't remember. A. Unh-unh (Indicating no). Q. Do you know of any any any type	2 3 4 5 6 7 8 9	 A. Pills. Q. Pills. Do either of your parents take shots? A. Pills. Q. They both take pills? A. Uh-huh (Indicating yes). Q. Okay. How long has how long has she known she has diabetes? A. I'd say probably about two years. Q. Two years. So she didn't have it when she
2 3 4 5 6 7 8 9 10	 Q. No. What about your what about your father's parents? A. Grandfather died of cancer, and I think Grandmother died of natural causes, also. Q. Natural causes. Do you remember what kind of cancer he had? A. I don't remember. Q. Don't remember. A. Unh-unh (Indicating no). Q. Do you know of any any any type illnesses, like seizures or lupus or anything like 	2 3 4 5 6 7 8 9 10	 A. Pills. Q. Pills. Do either of your parents take shots? A. Pills. Q. They both take pills? A. Uh-huh (Indicating yes). Q. Okay. How long has how long has she known she has diabetes? A. I'd say probably about two years. Q. Two years. So she didn't have it when she was a child or anything?
2 3 4 5 6 7 8 9 10 11	Q. No. What about your what about your father's parents? A. Grandfather died of cancer, and I think Grandmother died of natural causes, also. Q. Natural causes. Do you remember what kind of cancer he had? A. I don't remember. Q. Don't remember. A. Unh-unh (Indicating no). Q. Do you know of any any any type illnesses, like seizures or lupus or anything like that, that runs through your	2 3 4 5 6 7 8 9 10 11 12	 A. Pills. Q. Pills. Do either of your parents take shots? A. Pills. Q. They both take pills? A. Uh-huh (Indicating yes). Q. Okay. How long has how long has she known she has diabetes? A. I'd say probably about two years. Q. Two years. So she didn't have it when she was a child or anything? A. No.
2 3 4 5 6 7 8 9 10 11 12 13	Q. No. What about your what about your father's parents? A. Grandfather died of cancer, and I think Grandmother died of natural causes, also. Q. Natural causes. Do you remember what kind of cancer he had? A. I don't remember. Q. Don't remember. A. Unh-unh (Indicating no). Q. Do you know of any any any type illnesses, like seizures or lupus or anything like that, that runs through your A. No. The other side.	2 3 4 5 6 7 8 9 10 11 12 13	 A. Pills. Q. Pills. Do either of your parents take shots? A. Pills. Q. They both take pills? A. Uh-huh (Indicating yes). Q. Okay. How long has how long has she known she has diabetes? A. I'd say probably about two years. Q. Two years. So she didn't have it when she was a child or anything? A. No. Q. Okay. Do you have any nieces or nephews
2 3 4 5 6 7 8 9 10 11 12 13 14	Q. No. What about your what about your father's parents? A. Grandfather died of cancer, and I think Grandmother died of natural causes, also. Q. Natural causes. Do you remember what kind of cancer he had? A. I don't remember. Q. Don't remember. A. Unh-unh (Indicating no). Q. Do you know of any any any type illnesses, like seizures or lupus or anything like that, that runs through your A. No. The other side. Q. Dad's side of the family?	2 3 4 5 6 7 8 9 10 11 12 13 14	 A. Pills. Q. Pills. Do either of your parents take shots? A. Pills. Q. They both take pills? A. Uh-huh (Indicating yes). Q. Okay. How long has how long has she known she has diabetes? A. I'd say probably about two years. Q. Two years. So she didn't have it when she was a child or anything? A. No. Q. Okay. Do you have any nieces or nephews that have diabetes?
2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q. No. What about your what about your father's parents? A. Grandfather died of cancer, and I think Grandmother died of natural causes, also. Q. Natural causes. Do you remember what kind of cancer he had? A. I don't remember. Q. Don't remember. A. Unh-unh (Indicating no). Q. Do you know of any any any type illnesses, like seizures or lupus or anything like that, that runs through your A. No. The other side. Q. Dad's side of the family? A. No.	2 3 4 5 6 7 8 9 10 11 12 13 14 15	 A. Pills. Q. Pills. Do either of your parents take shots? A. Pills. Q. They both take pills? A. Uh-huh (Indicating yes). Q. Okay. How long has how long has she known she has diabetes? A. I'd say probably about two years. Q. Two years. So she didn't have it when she was a child or anything? A. No. Q. Okay. Do you have any nieces or nephews that have diabetes? A. No.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q. No. What about your what about your father's parents? A. Grandfather died of cancer, and I think Grandmother died of natural causes, also. Q. Natural causes. Do you remember what kind of cancer he had? A. I don't remember. Q. Don't remember. A. Unh-unh (Indicating no). Q. Do you know of any any any type illnesses, like seizures or lupus or anything like that, that runs through your A. No. The other side. Q. Dad's side of the family? A. No. Q. No. Okay. Do you know if anybody in your	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A. Pills. Q. Pills. Do either of your parents take shots? A. Pills. Q. They both take pills? A. Uh-huh (Indicating yes). Q. Okay. How long has how long has she known she has diabetes? A. I'd say probably about two years. Q. Two years. So she didn't have it when she was a child or anything? A. No. Q. Okay. Do you have any nieces or nephews that have diabetes? A. No. Q. Okay. Is that your only other relative
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q. No. What about your what about your father's parents? A. Grandfather died of cancer, and I think Grandmother died of natural causes, also. Q. Natural causes. Do you remember what kind of cancer he had? A. I don't remember. Q. Don't remember. A. Unh-unh (Indicating no). Q. Do you know of any any any type illnesses, like seizures or lupus or anything like that, that runs through your A. No. The other side. Q. Dad's side of the family? A. No. Q. No. Okay. Do you know if anybody in your family has any kidney problems?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	 A. Pills. Q. Pills. Do either of your parents take shots? A. Pills. Q. They both take pills? A. Uh-huh (Indicating yes). Q. Okay. How long has how long has she known she has diabetes? A. I'd say probably about two years. Q. Two years. So she didn't have it when she was a child or anything? A. No. Q. Okay. Do you have any nieces or nephews that have diabetes? A. No. Q. Okay. Is that your only other relative that has diabetes?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. No. What about your what about your father's parents? A. Grandfather died of cancer, and I think Grandmother died of natural causes, also. Q. Natural causes. Do you remember what kind of cancer he had? A. I don't remember. Q. Don't remember. A. Unh-unh (Indicating no). Q. Do you know of any any any type illnesses, like seizures or lupus or anything like that, that runs through your A. No. The other side. Q. Dad's side of the family? A. No. Q. No. Okay. Do you know if anybody in your family has any kidney problems? A. No.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. Pills. Q. Pills. Do either of your parents take shots? A. Pills. Q. They both take pills? A. Uh-huh (Indicating yes). Q. Okay. How long has how long has she known she has diabetes? A. I'd say probably about two years. Q. Two years. So she didn't have it when she was a child or anything? A. No. Q. Okay. Do you have any nieces or nephews that have diabetes? A. No. Q. Okay. Is that your only other relative that has diabetes? A. That's the only one.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Q. No. What about your what about your father's parents? A. Grandfather died of cancer, and I think Grandmother died of natural causes, also. Q. Natural causes. Do you remember what kind of cancer he had? A. I don't remember. Q. Don't remember. A. Unh-unh (Indicating no). Q. Do you know of any any any type illnesses, like seizures or lupus or anything like that, that runs through your A. No. The other side. Q. Dad's side of the family? A. No. Q. No. Okay. Do you know if anybody in your family has any kidney problems? A. No. Q. No. Do you have any aunts or uncles that	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	 A. Pills. Q. Pills. Do either of your parents take shots? A. Pills. Q. They both take pills? A. Uh-huh (Indicating yes). Q. Okay. How long has how long has she known she has diabetes? A. I'd say probably about two years. Q. Two years. So she didn't have it when she was a child or anything? A. No. Q. Okay. Do you have any nieces or nephews that have diabetes? A. No. Q. Okay. Is that your only other relative that has diabetes? A. That's the only one. Q. Okay. Now, do you have do you have any
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. No. What about your what about your father's parents? A. Grandfather died of cancer, and I think Grandmother died of natural causes, also. Q. Natural causes. Do you remember what kind of cancer he had? A. I don't remember. Q. Don't remember. A. Unh-unh (Indicating no). Q. Do you know of any any any type illnesses, like seizures or lupus or anything like that, that runs through your A. No. The other side. Q. Dad's side of the family? A. No. Q. No. Okay. Do you know if anybody in your family has any kidney problems? A. No. Q. No. Do you have any aunts or uncles that are that that get sick or have any problems,	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. Pills. Q. Pills. Do either of your parents take shots? A. Pills. Q. They both take pills? A. Uh-huh (Indicating yes). Q. Okay. How long has how long has she known she has diabetes? A. I'd say probably about two years. Q. Two years. So she didn't have it when she was a child or anything? A. No. Q. Okay. Do you have any nieces or nephews that have diabetes? A. No. Q. Okay. Is that your only other relative that has diabetes? A. That's the only one. Q. Okay. Now, do you have do you have any more sisters?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Q. No. What about your what about your father's parents? A. Grandfather died of cancer, and I think Grandmother died of natural causes, also. Q. Natural causes. Do you remember what kind of cancer he had? A. I don't remember. Q. Don't remember. A. Unh-unh (Indicating no). Q. Do you know of any any any type illnesses, like seizures or lupus or anything like that, that runs through your A. No. The other side. Q. Dad's side of the family? A. No. Q. No. Okay. Do you know if anybody in your family has any kidney problems? A. No. Q. No. Do you have any aunts or uncles that	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. Pills. Q. Pills. Do either of your parents take shots? A. Pills. Q. They both take pills? A. Uh-huh (Indicating yes). Q. Okay. How long has how long has she known she has diabetes? A. I'd say probably about two years. Q. Two years. So she didn't have it when she was a child or anything? A. No. Q. Okay. Do you have any nieces or nephews that have diabetes? A. No. Q. Okay. Is that your only other relative that has diabetes? A. That's the only one. Q. Okay. Now, do you have do you have any more sisters? A. Thelma Mason.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. No. What about your what about your father's parents? A. Grandfather died of cancer, and I think Grandmother died of natural causes, also. Q. Natural causes. Do you remember what kind of cancer he had? A. I don't remember. Q. Don't remember. A. Unh-unh (Indicating no). Q. Do you know of any any any type illnesses, like seizures or lupus or anything like that, that runs through your A. No. The other side. Q. Dad's side of the family? A. No. Q. No. Okay. Do you know if anybody in your family has any kidney problems? A. No. Q. No. Do you have any aunts or uncles that are that that get sick or have any problems, any health problems? A. No.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 A. Pills. Q. Pills. Do either of your parents take shots? A. Pills. Q. They both take pills? A. Uh-huh (Indicating yes). Q. Okay. How long has how long has she known she has diabetes? A. I'd say probably about two years. Q. Two years. So she didn't have it when she was a child or anything? A. No. Q. Okay. Do you have any nieces or nephews that have diabetes? A. No. Q. Okay. Is that your only other relative that has diabetes? A. That's the only one. Q. Okay. Now, do you have do you have any more sisters? A. Thelma Mason. Q. Thelma spell it on the record?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. No. What about your what about your father's parents? A. Grandfather died of cancer, and I think Grandmother died of natural causes, also. Q. Natural causes. Do you remember what kind of cancer he had? A. I don't remember. Q. Don't remember. A. Unh-unh (Indicating no). Q. Do you know of any any any type illnesses, like seizures or lupus or anything like that, that runs through your A. No. The other side. Q. Dad's side of the family? A. No. Q. No. Okay. Do you know if anybody in your family has any kidney problems? A. No. Q. No. Do you have any aunts or uncles that are that that get sick or have any problems, any health problems?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	 A. Pills. Q. Pills. Do either of your parents take shots? A. Pills. Q. They both take pills? A. Uh-huh (Indicating yes). Q. Okay. How long has how long has she known she has diabetes? A. I'd say probably about two years. Q. Two years. So she didn't have it when she was a child or anything? A. No. Q. Okay. Do you have any nieces or nephews that have diabetes? A. No. Q. Okay. Is that your only other relative that has diabetes? A. That's the only one. Q. Okay. Now, do you have do you have any more sisters? A. Thelma Mason. Q. Thelma spell it on the record? A. Thelma, T-H-E-L-M-A.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. No. What about your what about your father's parents? A. Grandfather died of cancer, and I think Grandmother died of natural causes, also. Q. Natural causes. Do you remember what kind of cancer he had? A. I don't remember. Q. Don't remember. A. Unh-unh (Indicating no). Q. Do you know of any any any type illnesses, like seizures or lupus or anything like that, that runs through your A. No. The other side. Q. Dad's side of the family? A. No. Q. No. Okay. Do you know if anybody in your family has any kidney problems? A. No. Q. No. Do you have any aunts or uncles that are that that get sick or have any problems, any health problems? A. No. Q. No. Any do you have any cousins that	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 A. Pills. Q. Pills. Do either of your parents take shots? A. Pills. Q. They both take pills? A. Uh-huh (Indicating yes). Q. Okay. How long has how long has she known she has diabetes? A. I'd say probably about two years. Q. Two years. So she didn't have it when she was a child or anything? A. No. Q. Okay. Do you have any nieces or nephews that have diabetes? A. No. Q. Okay. Is that your only other relative that has diabetes? A. That's the only one. Q. Okay. Now, do you have do you have any more sisters? A. Thelma Mason. Q. Thelma spell it on the record? A. Thelma, T-H-E-L-M-A.

Deposition of Mary Sanders

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	Page 118	-	Page 120
1	A. Yes.	1	A. I don't remember.
2	Q. Okay. Does Thelma have any health	2	Q. Don't remember. Okay. How old how old
3	problems?	3	is is Thelma?
4	A. High blood pressure.	4	A. She's 28.
5	Q. High blood pressure. Has she has he had	5	Q. Twenty-eight. So you're the oldest
6	any health problems that relate to taking diet drugs,	6	daughter?
7	that you know of?	7	A. Yes.
8	A. Not that I know of.	8	Q. And there's just three three daughters?
9	Q. Has she ever told you that her chest starts	9	A. Yes.
10	hurting like yours?	10	Q. And two sons?
11	A. Yes.	11	A. Yes.
12		12	
	Q. It does. Does she ever have any headaches		Q. Do you have any first cousins or or
13	like yours?	13	or relatives you're pretty close with?
14	A. Yes.	14	A. Yes. All.
15	Q. She does. Do you know if she's ever seen a	15	Q. All of them?
16	doctor about about either of those?	16	A. Yeah, all of them.
17	A. I know she's in and out at the doctor. You	17	Q. Are there any can you remember any of
18	know, I don't know what she goes for.	18	any of your relatives you are close to that might
19	Q. Is she in where does she live?	19	have taken any diet drugs?
20	A. Macon, Mississippi.	20	A. No.
21	Q. Macon. Does Tonya Tonya Lewis live	21	Q. No other relatives took diet drugs?
22	there, too?	22	A. No.
23	A. Yes.	23	Q. Are there are there any any of your
24	Q. Your your whole family live pretty close	24	relatives, you're pretty close to, that you talked to
25	together?	25	when you were taking diet drugs and told them about
			, , , , , , , , , , , , , , , , , , , ,
	Page 119		Page 121
1	Page 119 A. Yes. We're all in walking distance.	1	Page 121 how you felt, you felt jittery or anything?
1 2	A. Yes. We're all in walking distance.	1 2	how you felt, you felt jittery or anything?
	=	2	how you felt, you felt jittery or anything? A. Yes. It was everyone.
2	A. Yes. We're all in walking distance.Q. Okay. Are you pretty close with Tonya?A. Yes.	2	how you felt, you felt jittery or anything? A. Yes. It was everyone. Q. Everyone?
2 3 4	A. Yes. We're all in walking distance.Q. Okay. Are you pretty close with Tonya?A. Yes.Q. And with Thelma?	2 3 4	how you felt, you felt jittery or anything? A. Yes. It was everyone. Q. Everyone? A. You know, my whole family, because we're
2 3 4 5	A. Yes. We're all in walking distance.Q. Okay. Are you pretty close with Tonya?A. Yes.Q. And with Thelma?A. Yes.	2 3 4 5	how you felt, you felt jittery or anything? A. Yes. It was everyone. Q. Everyone? A. You know, my whole family, because we're all close. We're all there together.
2 3 4 5 6	 A. Yes. We're all in walking distance. Q. Okay. Are you pretty close with Tonya? A. Yes. Q. And with Thelma? A. Yes. Q. And okay. Do they both and so do you 	2 3 4 5 6	how you felt, you felt jittery or anything? A. Yes. It was everyone. Q. Everyone? A. You know, my whole family, because we're all close. We're all there together. Q. Y'all are there together?
2 3 4 5 6 7	 A. Yes. We're all in walking distance. Q. Okay. Are you pretty close with Tonya? A. Yes. Q. And with Thelma? A. Yes. Q. And okay. Do they both and so do you know if Tonya do you know if Thelma is is she 	2 3 4 5 6 7	how you felt, you felt jittery or anything? A. Yes. It was everyone. Q. Everyone? A. You know, my whole family, because we're all close. We're all there together. Q. Y'all are there together? A. Yes.
2 3 4 5 6 7 8	 A. Yes. We're all in walking distance. Q. Okay. Are you pretty close with Tonya? A. Yes. Q. And with Thelma? A. Yes. Q. And okay. Do they both and so do you know if Tonya do you know if Thelma is is she involved in any litigation involving diet drugs? 	2 3 4 5 6 7 8	how you felt, you felt jittery or anything? A. Yes. It was everyone. Q. Everyone? A. You know, my whole family, because we're all close. We're all there together. Q. Y'all are there together? A. Yes. Q. Are you closer with any of your cousins
2 3 4 5 6 7 8 9	 A. Yes. We're all in walking distance. Q. Okay. Are you pretty close with Tonya? A. Yes. Q. And with Thelma? A. Yes. Q. And okay. Do they both and so do you know if Tonya do you know if Thelma is is she involved in any litigation involving diet drugs? A. No. 	2 3 4 5 6 7 8 9	how you felt, you felt jittery or anything? A. Yes. It was everyone. Q. Everyone? A. You know, my whole family, because we're all close. We're all there together. Q. Y'all are there together? A. Yes. Q. Are you closer with any of your cousins than you are your sisters?
2 3 4 5 6 7 8 9	 A. Yes. We're all in walking distance. Q. Okay. Are you pretty close with Tonya? A. Yes. Q. And with Thelma? A. Yes. Q. And okay. Do they both and so do you know if Tonya do you know if Thelma is is she involved in any litigation involving diet drugs? A. No. Q. No? 	2 3 4 5 6 7 8 9	how you felt, you felt jittery or anything? A. Yes. It was everyone. Q. Everyone? A. You know, my whole family, because we're all close. We're all there together. Q. Y'all are there together? A. Yes. Q. Are you closer with any of your cousins than you are your sisters? A. No.
2 3 4 5 6 7 8 9 10	 A. Yes. We're all in walking distance. Q. Okay. Are you pretty close with Tonya? A. Yes. Q. And with Thelma? A. Yes. Q. And okay. Do they both and so do you know if Tonya do you know if Thelma is is she involved in any litigation involving diet drugs? A. No. Q. No? A. I don't think so. 	2 3 4 5 6 7 8 9 10	how you felt, you felt jittery or anything? A. Yes. It was everyone. Q. Everyone? A. You know, my whole family, because we're all close. We're all there together. Q. Y'all are there together? A. Yes. Q. Are you closer with any of your cousins than you are your sisters? A. No. Q. No. Okay. Do they all so do they all
2 3 4 5 6 7 8 9 10 11 12	 A. Yes. We're all in walking distance. Q. Okay. Are you pretty close with Tonya? A. Yes. Q. And with Thelma? A. Yes. Q. And okay. Do they both and so do you know if Tonya do you know if Thelma is is she involved in any litigation involving diet drugs? A. No. Q. No? A. I don't think so. Q. Did Tonya ever take diet drugs? 	2 3 4 5 6 7 8 9 10 11 12	how you felt, you felt jittery or anything? A. Yes. It was everyone. Q. Everyone? A. You know, my whole family, because we're all close. We're all there together. Q. Y'all are there together? A. Yes. Q. Are you closer with any of your cousins than you are your sisters? A. No. Q. No. Okay. Do they all so do they all know that you're involved in this litigation?
2 3 4 5 6 7 8 9 10 11 12 13	A. Yes. We're all in walking distance. Q. Okay. Are you pretty close with Tonya? A. Yes. Q. And with Thelma? A. Yes. Q. And okay. Do they both and so do you know if Tonya do you know if Thelma is is she involved in any litigation involving diet drugs? A. No. Q. No? A. I don't think so. Q. Did Tonya ever take diet drugs? A. No.	2 3 4 5 6 7 8 9 10 11 12 13	how you felt, you felt jittery or anything? A. Yes. It was everyone. Q. Everyone? A. You know, my whole family, because we're all close. We're all there together. Q. Y'all are there together? A. Yes. Q. Are you closer with any of your cousins than you are your sisters? A. No. Q. No. Okay. Do they all so do they all know that you're involved in this litigation? A. Well, I don't you know, more than no
2 3 4 5 6 7 8 9 10 11 12 13 14	A. Yes. We're all in walking distance. Q. Okay. Are you pretty close with Tonya? A. Yes. Q. And with Thelma? A. Yes. Q. And okay. Do they both and so do you know if Tonya do you know if Thelma is is she involved in any litigation involving diet drugs? A. No. Q. No? A. I don't think so. Q. Did Tonya ever take diet drugs? A. No. Q. Okay. And you said you went over to that	2 3 4 5 6 7 8 9 10 11 12 13 14	how you felt, you felt jittery or anything? A. Yes. It was everyone. Q. Everyone? A. You know, my whole family, because we're all close. We're all there together. Q. Y'all are there together? A. Yes. Q. Are you closer with any of your cousins than you are your sisters? A. No. Q. No. Okay. Do they all so do they all know that you're involved in this litigation? A. Well, I don't you know, more than no more than just family, than what we just
2 3 4 5 6 7 8 9 10 11 12 13 14 15	 A. Yes. We're all in walking distance. Q. Okay. Are you pretty close with Tonya? A. Yes. Q. And with Thelma? A. Yes. Q. And okay. Do they both and so do you know if Tonya do you know if Thelma is is she involved in any litigation involving diet drugs? A. No. Q. No? A. I don't think so. Q. Did Tonya ever take diet drugs? A. No. Q. Okay. And you said you went over to that clinic to that clinic with Thelma and with is 	2 3 4 5 6 7 8 9 10 11 12 13 14 15	how you felt, you felt jittery or anything? A. Yes. It was everyone. Q. Everyone? A. You know, my whole family, because we're all close. We're all there together. Q. Y'all are there together? A. Yes. Q. Are you closer with any of your cousins than you are your sisters? A. No. Q. No. Okay. Do they all so do they all know that you're involved in this litigation? A. Well, I don't you know, more than no more than just family, than what we just Q. Than just your mom and your dad?
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A. Yes. We're all in walking distance. Q. Okay. Are you pretty close with Tonya? A. Yes. Q. And with Thelma? A. Yes. Q. And okay. Do they both and so do you know if Tonya do you know if Thelma is is she involved in any litigation involving diet drugs? A. No. Q. No? A. I don't think so. Q. Did Tonya ever take diet drugs? A. No. Q. Okay. And you said you went over to that clinic to that clinic with Thelma and with is it Ms. Stallings? A. Right. Q. Is that Brenda? A. Yes.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	how you felt, you felt jittery or anything? A. Yes. It was everyone. Q. Everyone? A. You know, my whole family, because we're all close. We're all there together. Q. Y'all are there together? A. Yes. Q. Are you closer with any of your cousins than you are your sisters? A. No. Q. No. Okay. Do they all so do they all know that you're involved in this litigation? A. Well, I don't you know, more than no more than just family, than what we just Q. Than just your mom and your dad? A. Yes. Q. Okay. And your your husband knows? A. Yes. Q. Okay. Were y'all were y'all married
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. Yes. We're all in walking distance. Q. Okay. Are you pretty close with Tonya? A. Yes. Q. And with Thelma? A. Yes. Q. And okay. Do they both and so do you know if Tonya do you know if Thelma is is she involved in any litigation involving diet drugs? A. No. Q. No? A. I don't think so. Q. Did Tonya ever take diet drugs? A. No. Q. Okay. And you said you went over to that clinic to that clinic with Thelma and with is it Ms. Stallings? A. Right. Q. Is that Brenda? A. Yes. Q. And do you remember either of them was	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	how you felt, you felt jittery or anything? A. Yes. It was everyone. Q. Everyone? A. You know, my whole family, because we're all close. We're all there together. Q. Y'all are there together? A. Yes. Q. Are you closer with any of your cousins than you are your sisters? A. No. Q. No. Okay. Do they all so do they all know that you're involved in this litigation? A. Well, I don't you know, more than no more than just family, than what we just Q. Than just your mom and your dad? A. Yes. Q. Okay. And your your husband knows? A. Yes.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 A. Yes. We're all in walking distance. Q. Okay. Are you pretty close with Tonya? A. Yes. Q. And with Thelma? A. Yes. Q. And okay. Do they both and so do you know if Tonya do you know if Thelma is is she involved in any litigation involving diet drugs? A. No. Q. No? A. I don't think so. Q. Did Tonya ever take diet drugs? A. No. Q. Okay. And you said you went over to that clinic to that clinic with Thelma and with is it Ms. Stallings? A. Right. Q. Is that Brenda? A. Yes. Q. And do you remember either of them was it you said that you heard some customers talking about going over to see that doctor. Do you remember 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	how you felt, you felt jittery or anything? A. Yes. It was everyone. Q. Everyone? A. You know, my whole family, because we're all close. We're all there together. Q. Y'all are there together? A. Yes. Q. Are you closer with any of your cousins than you are your sisters? A. No. Q. No. Okay. Do they all so do they all know that you're involved in this litigation? A. Well, I don't you know, more than no more than just family, than what we just Q. Than just your mom and your dad? A. Yes. Q. Okay. And your your husband knows? A. Yes. Q. Okay. Were y'all were y'all married I don't know if I remember or not. Were y'all
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. Yes. We're all in walking distance. Q. Okay. Are you pretty close with Tonya? A. Yes. Q. And with Thelma? A. Yes. Q. And okay. Do they both and so do you know if Tonya do you know if Thelma is is she involved in any litigation involving diet drugs? A. No. Q. No? A. I don't think so. Q. Did Tonya ever take diet drugs? A. No. Q. Okay. And you said you went over to that clinic to that clinic with Thelma and with is it Ms. Stallings? A. Right. Q. Is that Brenda? A. Yes. Q. And do you remember either of them was it you said that you heard some customers talking	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	how you felt, you felt jittery or anything? A. Yes. It was everyone. Q. Everyone? A. You know, my whole family, because we're all close. We're all there together. Q. Y'all are there together? A. Yes. Q. Are you closer with any of your cousins than you are your sisters? A. No. Q. No. Okay. Do they all so do they all know that you're involved in this litigation? A. Well, I don't you know, more than no more than just family, than what we just Q. Than just your mom and your dad? A. Yes. Q. Okay. And your your husband knows? A. Yes. Q. Okay. Were y'all were y'all married I don't know if I remember or not. Were y'all married when you took diet drugs in '99? A. Yes.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 A. Yes. We're all in walking distance. Q. Okay. Are you pretty close with Tonya? A. Yes. Q. And with Thelma? A. Yes. Q. And okay. Do they both and so do you know if Tonya do you know if Thelma is is she involved in any litigation involving diet drugs? A. No. Q. No? A. I don't think so. Q. Did Tonya ever take diet drugs? A. No. Q. Okay. And you said you went over to that clinic to that clinic with Thelma and with is it Ms. Stallings? A. Right. Q. Is that Brenda? A. Yes. Q. And do you remember either of them was it you said that you heard some customers talking about going over to see that doctor. Do you remember 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	how you felt, you felt jittery or anything? A. Yes. It was everyone. Q. Everyone? A. You know, my whole family, because we're all close. We're all there together. Q. Y'all are there together? A. Yes. Q. Are you closer with any of your cousins than you are your sisters? A. No. Q. No. Okay. Do they all so do they all know that you're involved in this litigation? A. Well, I don't you know, more than no more than just family, than what we just Q. Than just your mom and your dad? A. Yes. Q. Okay. And your your husband knows? A. Yes. Q. Okay. Were y'all were y'all married I don't know if I remember or not. Were y'all married when you took diet drugs in '99? A. Yes. Q. You were. Okay. Do you have any close
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. Yes. We're all in walking distance. Q. Okay. Are you pretty close with Tonya? A. Yes. Q. And with Thelma? A. Yes. Q. And okay. Do they both and so do you know if Tonya do you know if Thelma is is she involved in any litigation involving diet drugs? A. No. Q. No? A. I don't think so. Q. Did Tonya ever take diet drugs? A. No. Q. Okay. And you said you went over to that clinic to that clinic with Thelma and with is it Ms. Stallings? A. Right. Q. Is that Brenda? A. Yes. Q. And do you remember either of them was it you said that you heard some customers talking about going over to see that doctor. Do you remember if either Thelma or Brenda might have known to go	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	how you felt, you felt jittery or anything? A. Yes. It was everyone. Q. Everyone? A. You know, my whole family, because we're all close. We're all there together. Q. Y'all are there together? A. Yes. Q. Are you closer with any of your cousins than you are your sisters? A. No. Q. No. Okay. Do they all so do they all know that you're involved in this litigation? A. Well, I don't you know, more than no more than just family, than what we just Q. Than just your mom and your dad? A. Yes. Q. Okay. And your your husband knows? A. Yes. Q. Okay. Were y'all were y'all married I don't know if I remember or not. Were y'all married when you took diet drugs in '99? A. Yes.

Deposition of Mary Sanders

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	Page 122	l	Page 124
1	Q. No. She's is she pretty much your only	1	Q. It has fluctuated?
2	friend outside the family?	2	A. Yeah.
3	A. Yes.	3	Q. Are there any any specific reasons, that
4	Q. Okay. Do y'all do much socially together?	4	you know of, why it would have gone up and down?
5	A. No. Just talk on the phone.	5	Were you were you exercising more or dieting when
6	Q. Just talk on the phone. Do any other	6	it happened?
7	ladies work in the shop with you when you're working?	7	A. I don't know. I don't know. I would say,
8	A. No.	8	you know, trying to diet or exercise.
9	Q. No. You're the just you're the sole	9	Q. Okay. Have you ever have you ever gone
10	sole owner and and employee?	10	on any diets? You ever tried to diet much?
11	A. Yes.	11	A. Well, the cabbage diet.
12	Q. Okay. Do you have any regular clients you	12	Q. You did you tried the cabbage diet?
13	see all the time?	13	A. Basically, that's it.
14	A. Yes.	14	Q. That's is that the only organized diet
15	Q. Any of them that you consider friends, that	15	you've done?
16	y'all talk a lot?	16	A. Yeah.
17	A. Yes.	17	Q. Were you did you enjoy the cabbage diet?
18	Q. And you have you talked to your	18	A. Unh-unh (Indicating no). I've always
19	talked to any of them about your litigation?	19	failed.
20	A. No.	20	Q. Always failed. Do you remember do you
21	Q. No. Talked to any of them about taking	21	remember why it was what it is about eating
22	diet drugs?	22	cabbage that supposedly made it that way?
23	A. No.	23	A. I didn't like the taste.
24	Q. So some of them were talking about taking	24	Q. Okay.
25	diet drugs, though, weren't they?	25	A. I didn't I didn't like the taste.
	,		
	Page 123		Page 125
1	A. Yeah. That was like, you know, when I was	1	Q. Did did you lose any weight on it?
2	working at one of those beauty shops.	2	A. No.
3	Q. Do you remember who any of those people	3	Q. No?
4	were and what what they took?	4	A. I I might have did it a week, if it was
5	A. I don't remember.	5	a week.
6	Q. Don't remember. Okay. All right. I want	6	Q. Did it for a week?
7	to ask you a few questions just generally about	7	A. I I never stayed on it.
8	weight. You said your current weight right now is	8	Q. Have you ever done any any other diets
9	close to 200; is that correct?	9	like South Beach Diet or the Atkins Diet?
10	A. Yes.	10	A. No.
11	Q. And you're how tall are you?	11	Q. No. Have you ever belonged to any kind of
12	A. Five-one.	12	diet program, like like Weight Watchers or
13	Q. Five-one. What is the most you've ever	13	something maybe through a church or anything?
14	weighed?	14	A. NutriSystem.
15	A. This is the heaviest I've ever been.	15	Q. NutriSystem. Where where were you a
16	Q. The heaviest right now. What's the least	16	part of NutriSystem?
17	you've ever weighed as an adult?	17	A. In Columbus.
18	A. 155.	18	Q. In Columbus?
19	Q. 155?	19	A. Yes.
20	A. (Nodded head affirmatively).	20	Q. How long did you do NutriSystem?
21	Q. Does your has your weight ever, like,	21	A. I probably did like a total maybe like a
22	just fluctuated, gone up real real high and gone	22	month
23	back down? Has it ever done that, or has it just	23	Q. A month?
24	steadily gotten	24	A if it was a month.
25	A. Yes, it has fluctuated.	25	Q. Did you have any success?

Deposition of Mary Sanders

	Page 126		Page 128
1	A. No.	1	A. Yes.
2	Q. No. Sorry. Did you have you ever done	2	Q. They did. Did you ever feel lightheaded
3	anything else just on your own, like any kind of	3	and dizzy?
4	just diets maybe you picked up out of a book and	4	A. Yes.
5	tried to do or anything?	5	Q. Okay. Did you and did you ever were
6	A. No.	6	you ever able to work out without any discomfort?
7	Q. No. What about what about exercise	7	A. No.
8	programs? Have you ever belonged to a gym?	8	Q. No. Okay. Any other exercise programs you
9	A. Yes.	9	ever belonged to, like
10 11	Q. What do you currently belong to a gym? A. No.	10 11	A. No.
12	A. No. Q. What what gym did you belong to?	12	Q you know, an aerobics class or a swim
13	A. Jim's Gym in Macon, Mississippi.	13	class or anything? A. No.
14	Q. Okay. Did were you pretty active there	14	Q. No. Have you ever tried any exercising on
15	when you belonged?	15	your own?
16	A. I don't guess I was too active, but I went.	16	A. Yes.
17	Q. About about how often?	17	Q. What type exercises do you do?
18	A. Maybe about once or twice a week.	18	A. Walking.
19	Q. Okay. Well, how long did you go?	19	Q. You walk?
20	A. Well, I had a six-month membership, so I	20	A. Uh-huh (Indicating yes).
21	I didn't I just had to pay the money. So	21	Q. Do you walk with friends and family or just
22	Q. Right. Right. About when when would	22	by yourself?
23	this have been, a couple of years ago or	23	A. Sister.
24	A. No. About six months ago.	24	Q. Sister?
25	Q. About six months ago?	25	A. Yes.
	,	1	
	Page 127		Page 120
1	Page 127 A. Yes.	1	Page 129 O. Which sister?
1 2	Page 127 A. Yes. Q. Okay. What did you do at the gym? Did	1 2	Q. Which sister?
	A. Yes.		Q. Which sister?A. Tonya.
2	A. Yes. Q. Okay. What did you do at the gym? Did you did you do weights, or did you just walk on a treadmill or	2	Q. Which sister?A. Tonya.
2 3	A. Yes. Q. Okay. What did you do at the gym? Did you did you do weights, or did you just walk on a	2	Q. Which sister?A. Tonya.Q. With Tonya. Do y'all do y'all do that
2 3 4 5 6	A. Yes. Q. Okay. What did you do at the gym? Did you did you do weights, or did you just walk on a treadmill or	2 3 4 5 6	Q. Which sister?A. Tonya.Q. With Tonya. Do y'all do y'all do that now?
2 3 4 5 6 7	A. Yes. Q. Okay. What did you do at the gym? Did you did you do weights, or did you just walk on a treadmill or A. Well, I tried to lift weights, and I walked on the treadmill maybe like five or ten minutes. Q. Okay.	2 3 4 5 6 7	 Q. Which sister? A. Tonya. Q. With Tonya. Do y'all do y'all do that now? A. Every now and then Q. Every now and then? A she'll try to get me to go.
2 3 4 5 6 7 8	A. Yes. Q. Okay. What did you do at the gym? Did you did you do weights, or did you just walk on a treadmill or A. Well, I tried to lift weights, and I walked on the treadmill maybe like five or ten minutes. Q. Okay. A. Then I'd get tired and go home.	2 3 4 5 6 7 8	 Q. Which sister? A. Tonya. Q. With Tonya. Do y'all do y'all do that now? A. Every now and then Q. Every now and then? A she'll try to get me to go. Q. About about how far do y'all walk?
2 3 4 5 6 7 8 9	A. Yes. Q. Okay. What did you do at the gym? Did you did you do weights, or did you just walk on a treadmill or A. Well, I tried to lift weights, and I walked on the treadmill maybe like five or ten minutes. Q. Okay. A. Then I'd get tired and go home. Q. What when you when you were doing	2 3 4 5 6 7 8	 Q. Which sister? A. Tonya. Q. With Tonya. Do y'all do y'all do that now? A. Every now and then Q. Every now and then? A she'll try to get me to go. Q. About about how far do y'all walk? A. I probably would almost get in a half a
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2 3 4 5 6 7 8 9 10 11 12	A. Yes. Q. Okay. What did you do at the gym? Did you did you do weights, or did you just walk on a treadmill or A. Well, I tried to lift weights, and I walked on the treadmill maybe like five or ten minutes. Q. Okay. A. Then I'd get tired and go home. Q. What when you when you were doing weights and stuff, did you ever did you ever just feel worn out and exhausted while you were doing that?	2 3 4 5 6 7 8 9 10 11 12	Q. Which sister? A. Tonya. Q. With Tonya. Do y'all do y'all do that now? A. Every now and then Q. Every now and then? A she'll try to get me to go. Q. About about how far do y'all walk? A. I probably would almost get in a half a mile. Q. Half a mile. And about how frequently do you do that?
2 3 4 5 6 7 8 9 10 11 12 13	A. Yes. Q. Okay. What did you do at the gym? Did you did you do weights, or did you just walk on a treadmill or A. Well, I tried to lift weights, and I walked on the treadmill maybe like five or ten minutes. Q. Okay. A. Then I'd get tired and go home. Q. What when you when you were doing weights and stuff, did you ever did you ever just feel worn out and exhausted while you were doing that? A. Yes.	2 3 4 5 6 7 8 9 10 11 12 13	Q. Which sister? A. Tonya. Q. With Tonya. Do y'all do y'all do that now? A. Every now and then Q. Every now and then? A she'll try to get me to go. Q. About about how far do y'all walk? A. I probably would almost get in a half a mile. Q. Half a mile. And about how frequently do you do that? A. Every blue moon. This is embarrassing.
2 3 4 5 6 7 8 9 10 11 12 13 14	A. Yes. Q. Okay. What did you do at the gym? Did you did you do weights, or did you just walk on a treadmill or A. Well, I tried to lift weights, and I walked on the treadmill maybe like five or ten minutes. Q. Okay. A. Then I'd get tired and go home. Q. What when you when you were doing weights and stuff, did you ever did you ever just feel worn out and exhausted while you were doing that? A. Yes. Q. Did your chest ever start hurting while you	2 3 4 5 6 7 8 9 10 11 12 13 14	Q. Which sister? A. Tonya. Q. With Tonya. Do y'all do y'all do that now? A. Every now and then Q. Every now and then? A she'll try to get me to go. Q. About about how far do y'all walk? A. I probably would almost get in a half a mile. Q. Half a mile. And about how frequently do you do that? A. Every blue moon. This is embarrassing. Q. Well, the weather is nice now. Maybe you
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. Yes. Q. Okay. What did you do at the gym? Did you did you do weights, or did you just walk on a treadmill or A. Well, I tried to lift weights, and I walked on the treadmill maybe like five or ten minutes. Q. Okay. A. Then I'd get tired and go home. Q. What when you when you were doing weights and stuff, did you ever did you ever just feel worn out and exhausted while you were doing that? A. Yes. Q. Did your chest ever start hurting while you were doing it? A. Yes. Q. It did. Did did did your chest always hurt?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. Which sister? A. Tonya. Q. With Tonya. Do y'all do y'all do that now? A. Every now and then Q. Every now and then? A she'll try to get me to go. Q. About about how far do y'all walk? A. I probably would almost get in a half a mile. Q. Half a mile. And about how frequently do you do that? A. Every blue moon. This is embarrassing. Q. Well, the weather is nice now. Maybe you can have more chance. Do y'all walk around the house, or do y'all go to a track? A. Go to a track, walking track. Q. Go to a track. Is there a track there in
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. Yes. Q. Okay. What did you do at the gym? Did you did you do weights, or did you just walk on a treadmill or A. Well, I tried to lift weights, and I walked on the treadmill maybe like five or ten minutes. Q. Okay. A. Then I'd get tired and go home. Q. What when you when you were doing weights and stuff, did you ever did you ever just feel worn out and exhausted while you were doing that? A. Yes. Q. Did your chest ever start hurting while you were doing it? A. Yes. Q. It did. Did did did your chest always hurt? A. Yes. Q. Okay. What about shortness of breath?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. Which sister? A. Tonya. Q. With Tonya. Do y'all do y'all do that now? A. Every now and then Q. Every now and then? A she'll try to get me to go. Q. About about how far do y'all walk? A. I probably would almost get in a half a mile. Q. Half a mile. And about how frequently do you do that? A. Every blue moon. This is embarrassing. Q. Well, the weather is nice now. Maybe you can have more chance. Do y'all walk around the house, or do y'all go to a track? A. Go to a track, walking track. Q. Go to a track. Is there a track there in Macon you go to? A. Yes. Q. Okay. Did you ever do any exercising, say,
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. Yes. Q. Okay. What did you do at the gym? Did you did you do weights, or did you just walk on a treadmill or A. Well, I tried to lift weights, and I walked on the treadmill maybe like five or ten minutes. Q. Okay. A. Then I'd get tired and go home. Q. What when you when you were doing weights and stuff, did you ever did you ever just feel worn out and exhausted while you were doing that? A. Yes. Q. Did your chest ever start hurting while you were doing it? A. Yes. Q. It did. Did did did your chest always hurt? A. Yes. Q. Okay. What about shortness of breath? A. Yes.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. Which sister? A. Tonya. Q. With Tonya. Do y'all do y'all do that now? A. Every now and then Q. Every now and then? A she'll try to get me to go. Q. About about how far do y'all walk? A. I probably would almost get in a half a mile. Q. Half a mile. And about how frequently do you do that? A. Every blue moon. This is embarrassing. Q. Well, the weather is nice now. Maybe you can have more chance. Do y'all walk around the house, or do y'all go to a track? A. Go to a track, walking track. Q. Go to a track. Is there a track there in Macon you go to? A. Yes. Q. Okay. Did you ever do any exercising, say, 15 years ago, when when you were younger, back
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. Yes. Q. Okay. What did you do at the gym? Did you did you do weights, or did you just walk on a treadmill or A. Well, I tried to lift weights, and I walked on the treadmill maybe like five or ten minutes. Q. Okay. A. Then I'd get tired and go home. Q. What when you when you were doing weights and stuff, did you ever did you ever just feel worn out and exhausted while you were doing that? A. Yes. Q. Did your chest ever start hurting while you were doing it? A. Yes. Q. It did. Did did did your chest always hurt? A. Yes. Q. Okay. What about shortness of breath? A. Yes. Q. You felt out of breath?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. Which sister? A. Tonya. Q. With Tonya. Do y'all do y'all do that now? A. Every now and then Q. Every now and then? A she'll try to get me to go. Q. About about how far do y'all walk? A. I probably would almost get in a half a mile. Q. Half a mile. And about how frequently do you do that? A. Every blue moon. This is embarrassing. Q. Well, the weather is nice now. Maybe you can have more chance. Do y'all walk around the house, or do y'all go to a track? A. Go to a track, walking track. Q. Go to a track. Is there a track there in Macon you go to? A. Yes. Q. Okay. Did you ever do any exercising, say, 15 years ago, when when you were younger, back in maybe before your children were born?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. Yes. Q. Okay. What did you do at the gym? Did you did you do weights, or did you just walk on a treadmill or A. Well, I tried to lift weights, and I walked on the treadmill maybe like five or ten minutes. Q. Okay. A. Then I'd get tired and go home. Q. What when you when you were doing weights and stuff, did you ever did you ever just feel worn out and exhausted while you were doing that? A. Yes. Q. Did your chest ever start hurting while you were doing it? A. Yes. Q. It did. Did did did your chest always hurt? A. Yes. Q. Okay. What about shortness of breath? A. Yes. Q. You felt out of breath? A. Yes.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. Which sister? A. Tonya. Q. With Tonya. Do y'all do y'all do that now? A. Every now and then Q. Every now and then? A she'll try to get me to go. Q. About about how far do y'all walk? A. I probably would almost get in a half a mile. Q. Half a mile. And about how frequently do you do that? A. Every blue moon. This is embarrassing. Q. Well, the weather is nice now. Maybe you can have more chance. Do y'all walk around the house, or do y'all go to a track? A. Go to a track, walking track. Q. Go to a track. Is there a track there in Macon you go to? A. Yes. Q. Okay. Did you ever do any exercising, say, 15 years ago, when when you were younger, back

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Page 130 Page 132 lot more? 1 1 Q. But you don't do it anymore? 2 A. Uh-huh (Indicating yes). 2 A. Unh-unh (Indicating no). 3 O. Did you ever do any weights or aerobics 3 Q. Is that -- you just -- you feel just too 4 back then? 4 winded? 5 A. No. Just mostly walking. 5 A. Uh-huh (Indicating yes). Q. Okay. All right. Do you -- do you 6 6 Q. Okay. currently take care of your house? Do you -- are you 7 A. And then, when my chest tightness, you 7 8 in charge of the cleaning and cooking and everything? 8 know, after that, I stop or something. 9 A. Yes. 9 Q. All right. But are you still able to work 10 Q. Are you able to take care of it well? 10 like you used to, though, put the same hours in? 11 A. Not like I used to. A. Well, yeah. I worked, but I never 11 12 Q. Not like you used to. Why is that? 12 worked -- really worked hard. 13 A. Be tired. 13 Q. Right. Okay. 14 Q. You get -- you get tired? A. I'd be there, but I never really worked 14 15 A. Get tired. 15 hard. 16 Q. You get -- your chest ever hurt when 16 Q. Okay. What about -- what about -- how late 17 you're --17 do you stay up these days? Do you find yourself 18 A. Chest hurts, head hurts. wanting to fall asleep a lot earlier, or do you stay 18 Q. Are you -- what are you pretty much 19 19 up pretty late? 20 responsible for, all of the house work or --20 A. I lose a lot of sleep. 21 A. Well, I have all of the house work, you 21 Q. You lose a lot of sleep. Do you have a lot know. My husband takes care of everything else. I 22 22 of sleepless nights? 23 do the house work. 23 A. Yes. 24 Q. Okay. He does the yard work and stuff? 24 Q. Okay. Do y'all -- do you ever -- do you 25 A. Yes. 25 ever find yourself just so exhausted, that you go to Page 131 Page 133 Q. What about cooking? Are you -- do you do 1 bed at 7 o'clock or --1 2 breakfast, lunch, and dinner or --2 A. Yes. But I -- I mean, I lay there, but I 3 A. Yes. 3 don't -- I don't be asleep. 4 Q. Okay. You said that you can't do it like 4 Q. Because you're restless? 5 you used to. What were you -- what did you used to 5 A. Yes. 6 be able to do? 6 Q. Okay. Have you -- have you taken any 7 A. Well, like every other week, you know, I 7 other -- done anything else -- besides the little 8 would probably just change around the house, like 8 dieting and exercise and taking diet drugs, have you 9 different rooms, you know. Just switched from this 9 done anything else to try to lose weight? 10 room to that room and just did a thorough cleaning. 10 A. No. 11 Q. When you say switch, what are you -- are 11 Q. Okay. Has any -- have any doctors ever 12 you switching, like -- like taking the linens off the 12 talked to you about -- about your weight, ever told bed and stuff or --13 you that you should probably loose weight? 13 14 A. Well, I used -- could be, like, take the 14 A. Yes. 15 living room and bedroom, make the bedroom the living 15 Q. Which -- which doctors? Do you remember? 16 room --A. I'm trying to think of his name. It was at 16 17 Q. Okay. 17 Starkville Clinic for Women. 18 A. -- the living room, the bedroom. 18 Q. Uh-huh (Indicating yes). 19 Q. All right. A. Well, they have five doctors, and I'm 19 A. I used to do that all of the time. 20 20 trying to think of the second one. 21 Q. Okay. 21 Q. But you would have been there for a A. Now I don't even do it anymore. 22 22 gynecology visit? 23 Q. Y'all just -- you used to pick up and move 23 A. Yes. 24 all of the furniture? 24 Q. And one -- one of the doctors there told 25 A. Uh-huh (Indicating yes). 25 you --

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	Page 134		Page 136
1	A. That I was, you know, overweight.	1	Q. Okay. And they
2	Q. Did they suggest you try to lose weight?	2	A and have high blood pressure.
3	A. Yes.	3	Q have high blood pressure?
4	Q. Did they tell you anything on advise you	4	A. Yes.
5	on how to lose weight?	5	Q. Okay. What about what about any other
6	A. Diet and exercise.	6	problems? Diabetes might be caused by weight. Has
7	Q. Diet and exercise. Did they give you any	7	anyone ever told you that?
8	specific exercises or a diet plan?	8	A. No. I no.
9	A. No.	9	Q. No. Okay. Do you have you heard of any
10	Q. Okay. Did they tell you did they tell	10	other specific problems people might have that are
11	you what will happen if you don't lose weight, or did	11	overweight?
12	they	12	A. No.
13	A. No.	13	Q. Okay. Do you understand that heart disease
14	Q. Did they did they say that your weight	14	sometimes is related to weight?
15	was causing any any problems for you?	15	A. No.
16	A. No.	16	Q. Okay. Has anyone ever told that or any
17	Q. Do you remember do you remember talking	17	physician or lay person ever told you that
18	to them and telling them I mean, you can did	18	respiratory problems sometimes are caused by being
19	you bring up the subject? Were you concerned?	19	overweight?
20	A. No. We were just looking at the chart one	20	A. Like what? For instance, like shortness of
21	day. I was just saying it was just a general	21	breath?
22	conversation, looking at the chart. That's all.	22	Q. Yeah. Things like that.
23	Q. And he said was it a he or she? Do you	23	A. Yeah. I have I have heard. I've never,
24 25	remember?	24 25	you know, talked to a physician on it, but I have heard it.
	A. It was a guy.	23	neard it.
1			
	Page 135		Page 137
1	Page 135 Q. It was a guy. And he said you're Ms.	1	Page 137 Q. Okay. You just heard it from a regular
1 2		1 2	- I
	Q. It was a guy. And he said you're Ms.	_	Q. Okay. You just heard it from a regular
2 3 4	Q. It was a guy. And he said you're Ms. Sanders, you're you might need to be worried about your weight? A. Yes.	2	Q. Okay. You just heard it from a regular person? A. Yes. Q. Okay. Has anyone ever told you that people
2 3 4 5	Q. It was a guy. And he said you're Ms. Sanders, you're you might need to be worried about your weight? A. Yes. Q. Okay. Did he tell you at all that you may	2	Q. Okay. You just heard it from a regular person? A. Yes. Q. Okay. Has anyone ever told you that people that are overweight sometimes are more fatigued than
2 3 4 5 6	Q. It was a guy. And he said you're Ms. Sanders, you're you might need to be worried about your weight? A. Yes. Q. Okay. Did he tell you at all that you may have health problems because of it?	2 3 4 5 6	Q. Okay. You just heard it from a regular person? A. Yes. Q. Okay. Has anyone ever told you that people that are overweight sometimes are more fatigued than other people?
2 3 4 5	Q. It was a guy. And he said you're Ms. Sanders, you're you might need to be worried about your weight? A. Yes. Q. Okay. Did he tell you at all that you may have health problems because of it? A. No.	2 3 4 5 6 7	Q. Okay. You just heard it from a regular person? A. Yes. Q. Okay. Has anyone ever told you that people that are overweight sometimes are more fatigued than other people? A. Yes.
2 3 4 5 6 7 8	Q. It was a guy. And he said you're Ms. Sanders, you're you might need to be worried about your weight? A. Yes. Q. Okay. Did he tell you at all that you may have health problems because of it? A. No. Q. Has any physician ever told you, you may	2 3 4 5 6 7 8	Q. Okay. You just heard it from a regular person? A. Yes. Q. Okay. Has anyone ever told you that people that are overweight sometimes are more fatigued than other people? A. Yes. Q. Okay. Who would be that would that have
2 3 4 5 6 7 8 9	Q. It was a guy. And he said you're Ms. Sanders, you're you might need to be worried about your weight? A. Yes. Q. Okay. Did he tell you at all that you may have health problems because of it? A. No. Q. Has any physician ever told you, you may have health problems, being overweight?	2 3 4 5 6 7 8 9	Q. Okay. You just heard it from a regular person? A. Yes. Q. Okay. Has anyone ever told you that people that are overweight sometimes are more fatigued than other people? A. Yes. Q. Okay. Who would be that would that have been a doctor?
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2 3 4 5 6 7 8 9 10	Q. It was a guy. And he said you're Ms. Sanders, you're you might need to be worried about your weight? A. Yes. Q. Okay. Did he tell you at all that you may have health problems because of it? A. No. Q. Has any physician ever told you, you may have health problems, being overweight? A. No. Q. Are you generally aware that overweight	2 3 4 5 6 7 8 9 10	Q. Okay. You just heard it from a regular person? A. Yes. Q. Okay. Has anyone ever told you that people that are overweight sometimes are more fatigued than other people? A. Yes. Q. Okay. Who would be that would that have been a doctor? A. No. Q. No?
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2 3 4 5 6 7 8 9 10 11 12 13	Q. It was a guy. And he said you're Ms. Sanders, you're you might need to be worried about your weight? A. Yes. Q. Okay. Did he tell you at all that you may have health problems because of it? A. No. Q. Has any physician ever told you, you may have health problems, being overweight? A. No. Q. Are you generally aware that overweight people sometimes have health problems? A. Yes.	2 3 4 5 6 7 8 9 10 11 12 13	Q. Okay. You just heard it from a regular person? A. Yes. Q. Okay. Has anyone ever told you that people that are overweight sometimes are more fatigued than other people? A. Yes. Q. Okay. Who would be that would that have been a doctor? A. No. Q. No? A. Just conversation. Q. Okay. Has anyone ever told you that people
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2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q. It was a guy. And he said you're Ms. Sanders, you're you might need to be worried about your weight? A. Yes. Q. Okay. Did he tell you at all that you may have health problems because of it? A. No. Q. Has any physician ever told you, you may have health problems, being overweight? A. No. Q. Are you generally aware that overweight people sometimes have health problems? A. Yes. Q. Do you know what any of those health problems might be?	2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q. Okay. You just heard it from a regular person? A. Yes. Q. Okay. Has anyone ever told you that people that are overweight sometimes are more fatigued than other people? A. Yes. Q. Okay. Who would be that would that have been a doctor? A. No. Q. No? A. Just conversation. Q. Okay. Has anyone ever told you that people that are overweight may have their joints might hurt more than someone who isn't?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q. It was a guy. And he said you're Ms. Sanders, you're you might need to be worried about your weight? A. Yes. Q. Okay. Did he tell you at all that you may have health problems because of it? A. No. Q. Has any physician ever told you, you may have health problems, being overweight? A. No. Q. Are you generally aware that overweight people sometimes have health problems? A. Yes. Q. Do you know what any of those health problems might be? A. No.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q. Okay. You just heard it from a regular person? A. Yes. Q. Okay. Has anyone ever told you that people that are overweight sometimes are more fatigued than other people? A. Yes. Q. Okay. Who would be that would that have been a doctor? A. No. Q. No? A. Just conversation. Q. Okay. Has anyone ever told you that people that are overweight may have their joints might hurt more than someone who isn't? A. No. I've never heard that.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q. It was a guy. And he said you're Ms. Sanders, you're you might need to be worried about your weight? A. Yes. Q. Okay. Did he tell you at all that you may have health problems because of it? A. No. Q. Has any physician ever told you, you may have health problems, being overweight? A. No. Q. Are you generally aware that overweight people sometimes have health problems? A. Yes. Q. Do you know what any of those health problems might be? A. No. Q. Okay. Has anyone ever told you that high	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q. Okay. You just heard it from a regular person? A. Yes. Q. Okay. Has anyone ever told you that people that are overweight sometimes are more fatigued than other people? A. Yes. Q. Okay. Who would be that would that have been a doctor? A. No. Q. No? A. Just conversation. Q. Okay. Has anyone ever told you that people that are overweight may have their joints might hurt more than someone who isn't? A. No. I've never heard that. Q. Okay. What about that people whose ankles
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. It was a guy. And he said you're Ms. Sanders, you're you might need to be worried about your weight? A. Yes. Q. Okay. Did he tell you at all that you may have health problems because of it? A. No. Q. Has any physician ever told you, you may have health problems, being overweight? A. No. Q. Are you generally aware that overweight people sometimes have health problems? A. Yes. Q. Do you know what any of those health problems might be? A. No. Q. Okay. Has anyone ever told you that high blood pressure may be a problem for people that are	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. Okay. You just heard it from a regular person? A. Yes. Q. Okay. Has anyone ever told you that people that are overweight sometimes are more fatigued than other people? A. Yes. Q. Okay. Who would be that would that have been a doctor? A. No. Q. No? A. Just conversation. Q. Okay. Has anyone ever told you that people that are overweight may have their joints might hurt more than someone who isn't? A. No. I've never heard that. Q. Okay. What about that people whose ankles and feet swell sometimes might be due to weight?
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Deposition of Mary Sanders

		Т	
	Page 138		Page 140
1	Q. No. Have you ever felt that your weight,	1	A. It's fine.
2	at all, has had a negative impact on your marriage?	2	Q. Is it pretty good?
3	A. No.	3	A. Yes.
4	Q. No. Okay. Have you ever felt that you	4	Q. Do y'all do y'all still are y'all
5	have your weight has had a negative impact on any	5	still able to do a lot of things together?
6	of your friendships or anything?	6	A. No.
7	A. No.	7	Q. No. Why why would that be?
8	Q. Okay. When you were younger, were you able	8	A. Headaches. Just be tired.
9	to exercise more than you are now?	9	Q. Headaches and tired?
10	A. Yes.	10	A. Yeah.
11	Q. Do you remember if you weighed less then or	11	Q. Is he is he able is he does his
12	about the same?	12	job let him let him come around the house a lot.
13	A. I weighed less.	13	Is he
14	Q. You weighed less. Can you remember any,	14	A. Well, he comes home on the weekends.
15	like, specific activities you used to do when you	15	
16	were much younger, that you can't do now?	16	
17	A. I just used to walk.	17	
18	Q. You used to be able to walk. What		Q. So during the week, he's not around. He's
1		18	on the road?
19	what walk a lot further and a lot longer?	19	A. He's on the road.
20	A. Well, I think we used to walk maybe like a	20	Q. Okay. On weekends, are y'all able to get
21	mile, a mile and a half	21	much done with you working?
22	Q. Okay.	22	A. When I get off on Saturdays, you know,
23	A with my mom. You know, we used to	23	that's supposed to be family day.
24	exercise then.	24	Q. Right.
25	Q. Right. Do you remember about how long ago	25	A. But I'll be too tired, so
	P 420		
1	Page 139	1	Page 141
1 2	that would have been?	1	Q. All right.
2	that would have been? A. I think in '88	2	Q. All right. A we'll go sit and watch a movie or
2 3	that would have been? A. I think in '88 Q. '88?	2	Q. All right. A we'll go sit and watch a movie or something.
2 3 4	that would have been? A. I think in '88 Q. '88? A or '89.	2 3 4	Q. All right. A we'll go sit and watch a movie or something. Q. Okay. Did y'all ever, in the past, used to
2 3 4 5	that would have been? A. I think in '88 Q. '88? A or '89. Q. Okay. Do you ever ride a bike, a bicycle?	2 3 4 5	Q. All right.A we'll go sit and watch a movie or something.Q. Okay. Did y'all ever, in the past, used to go out and do stuff?
2 3 4 5 6	that would have been? A. I think in '88 Q. '88? A or '89. Q. Okay. Do you ever ride a bike, a bicycle? A. Yes.	2 3 4 5 6	 Q. All right. A we'll go sit and watch a movie or something. Q. Okay. Did y'all ever, in the past, used to go out and do stuff? A. Yes.
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Deposition of Mary Sanders

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	Page 142		Page 144
1	Q. All right. Well, do you so is this back	1	by the store and pick up what you need?
2	before your children were born or after they were	2	 A. Well, my mother-in-law takes care of my
3	born?	3	children.
4	 A. You know, I think it was like after they 	4	Q. Okay.
5	was born. It was just when they was little kids.	5	A. You know, I'm at work, and she takes care
6	Q. Okay.	6	of my kids.
7	 A. My little girl was like two years old. 	7	Q. Where where are your kids during the
8	Q. She's two now?	8	day I mean during the on Monday through
9	A. No. She's	9	Thursday?
10	Q. Oh.	10	A. School. And when they're home from school,
11	A. She's five now.	11	they're home with me.
12	Q. Back when she was two?	12	Q. Okay.
13	A. Yeah.	13	A. You know, and my mother-in-law stays
14	Q. Okay. So about three years ago	14	next right next door
15	A. Yeah.	15	Q. All right.
16	Q y'all used to do a lot more?	16	A so she, you know, does all of the
17	A. Was it like three ago?	17	cooking.
18	Q. Is she five now?	18	Q. Are you pretty close to your mother-in-law?
19	A. Yeah, she's five. Yeah.	19	A. Yes.
20	Q. Well, has he had the same job for some	20	Q. She she sounds like she does a good job?
21	time?	21	A. Yes.
22	A. Yes.	22	Q. Do you pay her for taking care of your
23	Q. He's had the same route for a while?	23	kids, or does she
24	 A. Well, he's always been a truck driver. 	24	A. Yes.
25	Q. Right.	25	Q. Oh, you do. Okay.
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1			
	Page 143		Page 145
1	A. And basically, on the weekends, he's always	1	Page 145 A. When I try to pay her, she'll take it. And
2	A. And basically, on the weekends, he's always at home.	1 2	
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. And basically, on the weekends, he's always at home. Q. Okay. All right. Are you now, when he's gone, do you do all of the shopping? Do you get the groceries? A. You know what? I shop when it's time to cook for that particular day. Q. Okay. So you A. But I don't, you know, go to the grocery store like like I used to. Q. You don't go like you used to? A. Unh-unh (Indicating yes). Q. Well, what did you used to do? A. Usually, I'd go to the grocery store and shop, you know, get everything we need for that month, grocery shop. And now I be tired, so I don't even go. Q. Okay. Do you go so do you go just about every day, then, to try to make make dinner? A. Well, I don't cook every day. Q. You don't cook every day? A. No. Q. About how often do you cook now?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. When I try to pay her, she'll take it. And sometimes she won't. But Q. Okay. A I have a a grand mother-in-law. Q. All right. Is all of your husband's family right there by y'all? A. Yes. That's his family. Q. Okay. Are you close to any of his brothers or sisters? A. Yes. Q. Pretty close? A. His sister. Q. His sister. What's his sister's name? A. Indian Sanders. Q. Did you say India? A. Indian Sanders. THE COURT REPORTER: Can you spell it, please? A. Indian, I-N-D-I-A-N. Q. (By Mr. Blount) Okay. And does she live there next to y'all? A. Yes. Q. Do you and Indian talk very much?

Deposition of Mary Sanders

	Page 146		Page 148
1	kids at all?	1	Q. Do they come and do they come to your
2	A. She just lives there.	2	house?
3	Q. She just lives there?	3	A. Yeah. They come home
4	A. She just lives there.	4	Q. Okay.
5	Q. All right. What what would you say is	5	A you know. You know, I'll cook
6	an average day for you on the days that you don't	6	sometimes, maybe like, you know, something that's not
7	work, Sunday or Monday through Wednesday?	7	hard, that I don't have to run out to the store.
8	A. What you mean, average day?	8	Q. Right. Right.
9	Q. Like the average activities. Like, what	9	A. And mostly, my the mother-in-law my
10	what do you normally get up what time do you	10	mother-in-law cooks. So
11	normally get up in the morning?	11	Q. Okay. Does she come over to your place and
12	A. I get up every morning at 6:00.	12	cook, or does do they go over to her place?
13	Q. To get your kids ready for school?	13	A. Her house.
14	A. Get the kids ready for school.	14	Q. Okay. Do you usually go over there and
15	Q. Does that do you ever get does that	15	eat, too?
16	ever wear you out trying to get them ready for	16	A. No.
17	school?	17	Q. No. Okay. So what do do you do
18	A. Yes.	18	anything in the evenings
19	Q. It does?	19	A. No.
20	A. Yes.	20	Q routinely or anything?
21	Q. You get does your chest ever hurt while	21	A. No.
22	you're trying to get them ready?	22	Q. Do you do y'all go to church?
23	A. Uh-huh (Indicating yes).	23	A. Yes.
24	Q. Do you get up and fix them breakfast?	24	Q. Where do y'all go to church?
25	 A. No. They eat breakfast at school. 	25	A. Mt. Cormel Baptist Church.
		<u> </u>	
	Page 147	l	Page 149
1	Q. Okay. What about do you have to get	1	Q. There in Macon?
2	them have to get them dressed, or do they pretty	2	A. Yes.
3	much take care of that?	3	Q. Okay. Are you pretty active in the church?
4	A. My little girl, I just comb her hair.	4	A. No.
5	Q. Okay. And then after they go to school,	5	Q. No?
6	pretty much, what do you do with the rest of the day?	6	A. I don't do anything in the church. I just
7	A. This is embarrassing. I go back to sleep.	7	go to church.
8	Q. You go back to sleep?	8	Q. About how often do y'all go? Do you go on
9	A. Yes.	9	Sunday morning?
10	Q. I don't blame you one bit. I wish I could.	10	A. Well, they go just about every other
11	But so how about how late do you sleep, then?	11	Sunday, and I may go I might go like once a month,
12	A. Approximately like maybe like 1:00 or	12	maybe twice a month.
13	2:00. I don't really be asleep. I'll just be laying	13	Q. But but your your kids go every
14	there watching TV.	14	about ever other Sunday?
15	Q. All right. And then, what do you what	15	A. Just about every other Sunday.
16	do you do you when you get up?	16	Q. Is that where all of your family goes?
17	A. Just anything. I don't just say get up and	17	A. Yes.
18	cook, you know, clean up the house. It's the	18	Q. Is that where your your husband's family
19	house is not dirty now.	19	goes, too?
20	Q. Right.	20	A. Yes.
21	A. So, you know, I straighten up and basically	21	Q. Okay.
22 23	just lounge around the house. I'll put it like that.	22	MR. FORD: Let me change this tape.
23 24	Q. And then your kids get home in the afternoon from school?	23	MR. BLOUNT: Sure.
25	A. Uh-huh (Indicating yes).	24	MR. FORD: This concludes Tape No. 1
23	A. On hun (mulcaung yes).	25	of the deposition of Mary F. Sanders, taken on April
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Deposition of Mary Sanders

April 16, 2004

Page 150 Page 152 1 the 16th, 2004. The time is 12:21 p.m. We're off 1 Q. Do you have an idea of maybe how much 2 the record. 2 money, maybe, you lost? 3 (After a discussion off the record, 3 A. No. 4 the deposition continued as follows:) Q. No. Can you think of maybe how many days 4 5 MR. FORD: This begins Tape No. 2 in 5 you've missed as a result of -- total days of -- of the continuing deposition of Mary F. Sanders, taken 6 either having -- your chest hurting or your head 7 on April the 16th, 2004. The time is 12:40 p.m. hurting or -- or days you've had to take off to come 7 8 We're on the record. 8 talk to your attorney? Q. (By Mr. Blount) Okay, Ms. Sanders. I 9 A. No, unh-unh (Indicating no). 9 asked some questions about -- back to your -- some of 10 10 Q. Excuse me. Has any doctor ever told you the -- related to your -- the work you do? 11 that you need to -- that you need to stay home 11 A. Uh-huh (Indicating yes). 12 because of your condition? 12 13 Q. Have you ever had to stay home from work 13 A. No. 14 because of your -- your chest hurting you or your --14 Q. Okay. Do you remember what -- you -- you your headaches? Did you ever ---15 said last year, you filed your income taxes for 15 16 A. Yes. 16 \$6,000; is that correct? 17 Q. About how frequently does that happen? A. Yeah -- well, 2004. 17 18 A. On a scale of what? 18 Q. 2004? 19 Q. Well, I mean, like, say, on -- on an 19 A. 6,000. 20 average month, how many days do you have to take off 20 Q. Okay. 21 because -- because of your headaches and your chest 21 A. No. 2003 income tax. 22 pains or -- or any condition that you relate to your 22 Q. 2003. Okay. 23 taking diet drugs? 23 A. Sorry. 24 A. Well, with my chest pain, I've had to stay 24 Q. Well, I was about to say, if you've made 25 home maybe like once or twice within the past couple \$6,000 already, that's pretty good. When you were 25 Page 151 Page 153 1 of years. taking your -- taking the diet drugs prescribed by 1 2 O. Okav. 2 Dr. Henson, you said they made you feel jittery? 3 A. But like I say, with my chest, it tightens 3 A. Yes. 4 up, and I just relax. And then after a while, it'll 4 Q. Did they make you stay awake? Could you --5 pass over. 5 could you sleep while you were on them? 6 Q. Okay. 6 A. No. A. But that first headache -- it happens so 7 7 Q. No? 8 often, that I just can't take off work, you know, 8 MS. TOLLE: Could you clarify the 9 every time I get a headache. 9 answer to that question as far as, no, that they made 10 Q. Right. you stay awake, or, no, that you couldn't sleep? 10 11 A. I just try to just work through it. 11 A. Oh. I -- you know, I could sleep, but, you 12 O. Do you feel like you've lost any clients 12 know, I was always jittery like I always had to do 13 because of that, because of your --13 somethina. 14 14 Q. Okay. 15 Q. -- headache or having to take off a couple 15 A. And then I would just -- you know, when it 16 of days? was time to go to bed, you go to bed. You know, I'd 16 17 17 just lay down and mostly just watch TV --18 Q. No. Okay. Are you claiming lost wages in 18 Q. Okay. 19 your current lawsuit? Do you know? 19 A. -- until I would finally go to sleep. 20 A. I don't know. 20 Q. Did you -- did you lose -- you didn't --21 Q. Don't know. But do you think you've lost 21 did you lose weight on that -- on diet drugs? 22 any money because of taking diet drugs? 22 A. No. 23 A. I think I could have made more. 23 Q. No. Not even a couple of pounds? 24 Q. You could have made more? 24 A. Not that -- no. 25 A. I could have worked more. 25

Q. No?

Deposition of Mary Sanders

Mary S	Janucis
A. You know, I really didn't do a lot of weighing or notice my clothes Q. Did you try to diet while you were on them? A. No. Q. Did you do any exercise while you while you took the drugs? A. No. You know, I might have walked a little bit. Q. Okay. A. I I don't remember. Q. Did anybody tell you, you looked better, that you looked like you had lost weight? A. No. Q. No. Have you been back to see Dr. Henson at all since the last prescription? A. No. Q. Okay. Have you been back to the pharmacy, Kmart Pharmacy in Mobile, since then? A. No. Q. Okay. And you correct me if I'm wrong, but you said earlier that you've never talked to a doctor about taking diet drugs? A. No. Q. Okay. What all what all medical	taking diet drugs? A. I don't know. Q. You don't know. Has anyone told you that that's this is caused by taking diet drugs? A. No. Q. What made you what made you start to think that maybe they it was caused by diet drugs, maybe there was a relationship between taking diet drugs and your health problems? A. No more like say that again. Q. I'm sorry. What what made you think that maybe your health problems that there was a relationship between your health problems and the the diet drugs you took? A. Well, I have heard some people have died from the pill. And I know I I have taken them, and I know it would you know, complain of chest pains. Q. Uh-huh (Indicating yes). A. You know, you read about it and hear about it. Q. What exactly have what you said some people you heard some people had died from taking the pills?
Page 155 A. Well, headache, fatigue, chest pains, nauseated. Q. And what do you think these are symptoms of? Do you think that there's is there a certain condition that you claim that you have? A. No. Q. No. What about the conditions that are listed on that echocardiogram of Dr. Tai's that on the exhibit there? A. Well, I I really don't understand that. Q. Okay. But you don't feel do you feel like your heart is normal? A. No. Q. No. Do is there any specific thing about about your heart maybe you think is wrong? A. Just when it beats real fast, you know, chest tightening. I know that shouldn't happen like that all of the time. And just, like, as far as just having headaches and being out of breath, if I walk from here to there Q. Right. A I feel like I'm about to pass out. Q. Okay. A. I don't think all of that's normal. Q. Okay. And do you think this was caused by	Page 157 Q. What do you remember what pills? A. I don't know what pills, but I know it was, you know, fen-phen. Q. Fen-phen? A. And I know phentermine I know that had to be related, just some type of related. Q. Did someone tell you that was related to it? A. No. You know, no one just talking, you know, to people. Q. Uh-huh (Indicating yes). You said that you had seen the you had seen some things about it on you mean on television? A. Like yeah. Like TV and Internet. You know how you just read it, and someone has died Q. Uh-huh (Indicating yes). A from taking diet drugs pills. Q. Right. Do you remember do you remember what maybe what program you saw that talked about diet drugs pills? A. No. Just you know, just if you scan through the Internet and just seeing about it, reading it. Q. Did you remember any any web sites on the Internet you were on that talked about it?

Deposition of Mary Sanders

1 A. No. 2 Q. Okay. How did you come to hire the youryour current attorneys? 3 youryour current attorneys? 4 A. 1 don't remember. 5 Q. Do you remember if anybody told you that the Colom Law Firm was a good firm, that you should 7 go talk to them? 8 A. No. I don't - I - I don't remember. 9 I I don't remember how it got started. I 7 forgot. 10 Q. Do you remember seeing maybe any 2 advertisements from the Colom firm? 11 Q. Do you remember seeing maybe any 2 advertisements from the Colom firm? 12 A. No. Actually you know, and Macon is a 3 small town. 15 Q. Right. 16 Q. Right. 17 I dan't know one just followed the 20 other. We were just going to see what was going on. 2 Q. Al right. So you you knew all of 5 people, then, that took cliet drugs? 1 them, but not just talking to people like, you know. 2 hey, let's go do this pill or do that pill. 1 Q. Q. Okay. 2 Q. Right. 3 A. Well, there was a lot people in Macon, you know. 2 hey, let's go do this pill or do that pill. 3 Q. Right. 4 A. But like I said, it's Macon. You know, a lot of becople went to Gordo to get cliet pills. 4 Q. Okay. Can you remember any body else that took them besides Ms. Stallings? 3 A. Well, there was a lot people in Macon, you know. 3 Q. Al right. So you those with the work of the mames? 4 A. But like I said, it's Macon. You know, a lot of people went to Gordo to get cliet pills. 4 Q. Okay. Can you remember any body else that took them besides Ms. Stallings? 5 A. You know, I can't think of all of the names? 6 Q. Okay. 7 A. Yan't And Deborah Jones. 8 Q. Anybody else? 9 A. I chandler. 1 A. No. Chandler and hones, do you remember what 2 either one of them would have taken, what pills? 2 A. No. Chambers - you said chambers? I'm sorry. Chandler? 3 A. Chandler and Jones, do you remember what 2 either one of them would have taken, what pills? 4 A. No. 9 Q. Did they ever say they took fen-phen? 9 C. Chambers - you said chambers? I'm sorry. Chandler? 18 A. Chandler - Q. Chandler and Jones, do you remember what 2 either one of them would	1		Т.	
2 Q. Okay. How did you come to hire the	l	Page 158		Page 160
3 your your current attorneys? 4	1	A. No.	1	
4 A. I don't remember. 5 Q. Do you remember if anybody told you that the Colom Law Firm was a good firm, that you should go talk to them? 8 A. No. I don't - I - I don't remember. 9 I - I don't even remember how it got started. I forgot. 11 Q. Do you remember seeing maybe any advertisements from the Colom firm? 12 advertisements from the Colom firm? 13 A. No. Actually you know, and Macon Is a small town. 14 small town. 15 Q. Right. 16 A. And you hear word of mouth, you know, that it it was a lawsuit. They was checking up on those diet it it was a lawsuit. They was checking up on those diet it it was a lawsuit. They was checking up on those diet it it was a lawsuit. They was checking up on those diet it it was a lawsuit. They was checking up on those diet it it was a lawsuit. They was checking up on those diet it it was a lawsuit. They was checking up on those diet it it was a lawsuit. They was checking up on those diet it it was a lawsuit. They was checking up on those diet it it was a lawsuit. They was checking up on those diet it it was a lawsuit. They was checking up on those diet it it was a lawsuit. They was checking up on those diet it it was a lawsuit. They was checking up on those diet it it was a lawsuit. They was checking up on those diet it it was a sale polle when the oborde the other was going on. 19 Q. Okay. 20 Q. Okay. 21 A. And so, you know, one just followed the other. 22 A. You know, I know a lot of people that took. 23 Q. Right. 3 Q. Right. 4 A. You know, I know a lot of people that took. 4 A. But like I said, it's Macon. You know, a lot of people went to Gordo to get diet pills. 4 Q. Okay. Can you remember anybody else that took them besides Ms. Stallings? 4 A. Well, Just one. Lillian Chandler. 5 Q. Do you remember anybody else that took them besides Ms. Stallings? 4 A. Well, Just one. Lillian Chandler. 5 Q. Colom firm. 5 A. You know, I can't think of all of the names. 6 Q. Okay. 7 Q. Oo you remember if what pills Ms. 8 A. Well, Just one. Lillian Chandler. 9 Q. Do you remember if was pust	2	Q. Okay. How did you come to hire the	2	all went to the same place.
5 Q. Do you remember if anybody told you that the Clobom Law Firm was a good firm, that you should 7 go talk to them? 8 A. No. I don't - I - I don't remember. 10 forgot. 11 Q. Do you remember seeing maybe any 12 advertisements from the Colom firm? 12 advertisements from the Colom firm? 13 A. No. Actually you know, and Macon is a 14 small town. 15 Q. Right. 16 A. And you hear word of mouth, you know, that 17 it was a lawsuit. They was checking up on those diet 17 it was a lawsuit. They was checking up on those diet 17 it was a lawsuit. They was checking up on those diet 17 it was a lawsuit. They was checking up on those diet 18 pills that - because mostly everybody in Macon went 19 to Gordo. 10 Q. Okay. 21 A. And so, you know, one just followed the 22 other. We were just going to see what was going on 3. Q. All right. So you - you knew alo to 6 24 people, then, that took diet drugs? 25 A. You know, I know a lot of people that took 7 Page 159 1 them, but not just talking to people like, you know, 2 hey, let's go do this pill or do that pill. 3. Q. Right. 3 Q. Right. 4 A. But like I said, it's Macon. You know, a 1ot of people went to Gordo to get diet pills. 6. Q. Okay. Can you remember anybody else that took them besides Ms. Stallings? 8 A. Well, Istore was a lot people in Macon, you 9 know. 9 know. 10 Q. Do you remember anybody else that took them besides Ms. Stallings? 8 A. Well, Istore was a lot people in Macon, you 9 know. 9 know. 10 Q. Do you remember anybody else that took them besides Ms. Stallings? 11 A. Vest. And Deborah Jones. 12 Q. Allillian Chandler? 13 A. A. Well, Just one. Lillian Chandler. 14 Q. Do you remember any of their names? 15 A. Twas - it was just a lot of people. 16 Q. Do you remember any of their names? 17 A. I - you know, I can't think of all of the names. 18 you that you should go see the Colom Law Firm? 19 A. I wou fort ' the member any one person saying, hey, Mary, why don't you can go ahead on an answer? 19 Q. Do you remember if - what pills Ms. 10 Q	3	your your current attorneys?	3	Q. Was it about all the same time?
6 the Colom Law Firm was a good firm, that you should go talk to them? 7 go talk to them? 8 A. No. I don't – I — I don't remember. 9 I — I don't even remember how it got started. I 1 1 1 forgot. 10 Grogot. 11 Q. Do you remember seeing maybe any 2 advertisements from the Colom firm? 12 advertisements from the Colom firm? 13 A. No. Actually — you know, and Macon is a 14 small town. 14 small town. 15 Q. Right. 16 A. And you hear word of mouth, you know, that it it was a lawsuit. They was checking up on those diet it it was a lawsuit. They was checking up on those diet it it was a lawsuit. They was checking up on those diet it is dordo. 16 Q. Okay. 17 A. And so, you know, one just followed the 2 other. We were just going to see what was going on 2. 18 Q. All right. So you — you knew a lot of 2 people, then, that took diet drugs? 29 A. You know, I know a lot of people that took them besides Ms. Stallings? 10 A. But like I said, it's Macon. You know, a 10 to f people went to Gordo to get diet pills. 11 Q. Right. 12 A. But like I said, it's Macon. You know, a 10 to f people went to Gordo to get diet pills. 12 Q. Right. 13 A. Well, ust one. Lillian Chandler. 14 Summer besides Ms. Stallings? 15 A. Well, ust one. Lillian Chandler. 16 A. Well, ust one. Lillian Chandler. 17 Seculate. Did either — that either Ms. Chandler or Ms. Jones tell you don't know they have got paid for it. 18 Q. Right. 19 Q. Do you remember any other work of mouth, you know, that it was a a letter one there was a lot people like, you know, a 10 to f people went to Gordo to get diet pills. 20 Colom firm. 21 A. Well, just one. Lillian Chandler. 22 Q. Lillian Chandler? 23 A. Yesh. And Deborah Jones. 24 Q. Okay. 25 A. You know, I can't think of all of the names? 26 A. I don't know when they were represented by — who they were represented b	4	A. I don't remember.	4	A. No. I don't I don't know.
7 go talk to them? 8 A. No. I don't I I don't remember. 9 I I don't even remember how it got started. I 10 forgot. 10 forgot. 11 Q. Do you remember seeing maybe any 12 advertisements from the Colom firm? 12 advertisements from the Colom firm? 13 A. No. Actually you know, and Macon is a 14 small town. 15 Q. Right. 16 A. And you hear word of mouth, you know, that 16 it was a lawsuit. They was checking up on those diet 17 it was a lawsuit. They was checking up on those diet 18 pills that because mostly everybody in Macon went 19 to Gordo. 20 Q. Okay. 21 A. And so, you know, one just followed the 20 other. We were just going to see what was going on. 2 Q. All right. So you you knew a lot of 2 people, then, that took diet drugs? 25 A. You know, I know a lot of people that took 2 hew, let's go do this pill or do that pill. 22 them, but not just talking to people like, you know, hey, let's go do this pill or do that pill. 23 Q. Right. 24 A. But like I said, it's Macon. You know, a 10 tof people went to Gordo to get dilet pills. 25 do, Q. Okay. Can you remember anyybody else that took them besides Ms. Stallings? 26 A. Well, there was a lot people in Macon, you know. 27 hey, let's go do this pill or do that pill. 28 A. Well, there was a lot people in Macon, you know. 29 hey, let's go do this pill or do that pill. 30 Q. Right. 31 A. No. 31 A. No. 32 Q. All right. So you - you knew a lot of 22 people went to Gordo to get dilet pills. 33 Q. Right. 44 A. But like I said, it's Macon. You know, a 15 took them besides Ms. Stallings? 45 A. Well, there was a lot people in Macon, you know. 46 A. Well, there was a lot people in Macon, you know. 47 You know to that pill or do that pill. 48 A. Well, there was a lot people in Macon, you know. 49 A. Okay. Can you remember any of their names? 40 Q. Do you remember any of their names? 41 A. Well, there was a lot people in Macon, you know. 42 You don't know. Do you remember on you have repeased by who they were represented by who thexp event them say how much they	5	Q. Do you remember if anybody told you that	5	Q. Okay.
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12 advertisements from the Colom firm? 13 A. No. Actually you know, and Macon is a 14 small town. 15 Q. Right. 16 A. And you hear word of mouth, you know, that 17 it was a lawsuit. They was checking up on those diet 18 pillis that because mostly everybody in Macon went 19 to Gordo. 20 Q. Okay. 21 A. And so, you know, one just followed the 22 other. We were just going to see what was going on. 23 Q. All right. So you you knew a lot of 24 people, then, that took diet drugs? 25 A. You know, I know a lot of people like, you know, 26 Page 159 1 them, but not just talking to people like, you know, 27 let, let's go do this pill or do that pill. 28 A. Well, there was a lot people imacon, you 29 know. 20 Do you remember any of their names? 21 A. Well, just one. Lillian Chandler. 21 Q. Did you ever heard them say how much they 22 were paid? 23 A. No. 24 A. No. 25 A. No. 26 Don't know. I don't know. 27 Don't know. Do you know if they were 28 represented by who they were represented by, what 29 attorney? 29 A. Illian Chandler, I think the Colom Law 29 Firm. 20 Colom firm. 21 A. Or Beasley & Adam Beasley & Allen 21 A. Adam, something 22 Mary body be set diet pills. 23 A. Yes. 24 A. No. 25 A. No. 26 Don't know. I don't know. 27 Don't know. Do you know if they were 28 represented by who they were represented by, what 29 attorney? 29 A. Illian Chandler, I think the Colom Law 29 Firm. 20 Colom firm. 21 A. A Or Beasley & Adam Beasley & Allen 24 Adam, something 25 A. Or Beasley & Adam Beasley & Allen 26 Adam, something 27 MS. TOLLE: If you don't know, don't 28 you that you should go see the Colom Law Firm? 29 A. No. 20 Do you remember any of their names? 21 A. Chandler. 22 Lillian Chandler? 23 A. I don't remember any advertisements involving diet drugs and the Colom Law Firm? 24 A. I don't remember any advertisements involving diet drugs and the Colom Law Firm? 25 MS. TOLLE: You already asked that. 26 Okay. 27 Do you remember if what pills Ms. 28 Chandler 29 Do you remember if wh	11	Q. Do you remember seeing maybe any	11	
14 small town. Q. Right. A. And you hear word of mouth, you know, that it was a lawsuit. They was checking up on those diet pills that because mostly everybody in Macon went to Gordo. Q. Okay. Q. Okay. A. And so, you know, one just followed the other. We were just going to see what was going on. Q. All right. So you you knew a lot of people, then, that took diet drugs? A. You know, I know a lot of people that took Page 159 them, but not just talking to people like, you know, a lot of people went to Gordo to get diet pills. Q. Right. A. But like I said, it's Macon. You know, a lot of people went to Gordo to get diet pills. Q. Cokay. Can you remember anybody else that took them besides Ms. Stallings? A. Well, there was a lot people in Macon, you know. Q. Do you remember any of their names? A. Well, just one. Lillian Chandler. Q. Cillian Chandler? A. Yeah. And Deborah Jones. Q. Anybody else? A. Yeah. And Deborah Jones. Q. Chandler or Ms. Jones tell you that you should go see the Colom Law Firm? A. I was it was just a lot of people. Q. Okay. A. I don't know. I don't know. Q. Don't know. Do you know if they were represented by who they were represented by -	12	advertisements from the Colom firm?	12	·
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16 A. And you hear word of mouth, you know, that it was a lawsuit. They was checking up on those diet 17 bills that because mostly everybody in Macon went 18 to Gordo. 20 Q. Okay. 21 A. And so, you know, one just followed the other. We were just going to see what was going on. 22 Q. All right. So you you knew a lot of people, then, that took diet drugs? 23 A. You know, I know a lot of people that took 24 them, but not just talking to people like, you know, a lot of people went to Gordo to ged lite pills. 25 A. But like I said, it's Macon. You know, a lot of people went to Gordo to ged lite pills. 3 Q. Right. 4 A. But like I said, it's Macon. You know, a lot of people went to Gordo to ged lite pills. 4 A. But like I said, it's Macon. You know, a lot of people went to Gordo to ged lite pills. 5 lot of people went to Gordo to ged lite pills. 6 Q. Okay. Can you remember anybody else that took them besides Ms. Stallings? 8 A. Well, there was a lot people in Macon, you know. 9 Now. 10 Q. Do you remember any of their names? 11 A. Yeah, And Deborah Jones. 12 Q. Lillian Chandler? 13 A. Yeah, And Deborah Jones. 14 Q. Anybody else? 15 A. It was it was just a lot of people. 16 Q. Okay. 17 A. I you know, I can't think of all of the names. 18 Q. Do you remember if what pills Ms. 18 Chambers you said Chambers? I'm sorry. Chandler? 19 A. Chandler. 20 Chandler and Jones, do you remember what either one of them would have taken, what pills? 21 A. No. 22 Chandler and Jones, do you remember what either one of them would have taken, what pills? 22 A. No. 23 Chandler and Jones, do you remember what either one of them would have taken, what pills? 24 A. No. 25 Did you ever hear them say that it was court hearing, that they won a case? 26 A. I don't know. I don't know. 27 Don't know. Do you know flety were represented by who they were represented by who	14		14	
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19 to Gordo. 20 Q. Okay. 21 A. And so, you know, one just followed the other. We were just going to see what was going on. 22 Q. All right. So you you knew a lot of people, then, that took diet drugs? 25 A. You know, I know a lot of people that took 10 them, but not just talking to people like, you know, hey, let's go do this pill or do that pill. 22 Q. Right. 23 Q. Right. 3 Q. Right. 4 A. But like I said, it's Macon. You know, a lot of people went to Gordo to get diet pills. 4 A. But like I said, it's Macon. You know, a lot of people went to Gordo to get diet pills. 5 Q. Okay. Can you remember anybody else that took them besides Ms. Stallings? 4 A. Well, there was a lot people in Macon, you know. 5 Iot of people went to Gordo to get diet pills. 6 Q. Do you remember anybody else that took them besides Ms. Stallings? 8 A. Well, there was a lot people in Macon, you know. 9 know. 10 Q. Okay. Can you remember anybody else that took them besides Ms. Stallings? 11 A. Well, just one. Lillian Chandler. 12 Q. Lillian Chandler? 13 A. Yeah. And Deborah Jones. 14 Q. Anybody else? 15 A. It was it was just a lot of people. 16 Q. Okay. 17 A. I you know, I can't think of all of the names. 18 Q. Do you remember if what pills Ms. 18 Chambers you said Chambers? I'm sorry. Chandler? 19 Q. Chandler and Jones, do you remember what either one of them would have taken, what pills? 20 Chandler and Jones, do you remember what either one of them would have taken, what pills? 21 A. No.	18			÷. ,
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Deposition of Mary Sanders

	Page 162		Page 164
1	A. It was so long ago, I don't remember.	1	A. No. Columbus.
2	Q. Do you remember if it was before you went	2	Q. In Columbus. I got several in Columbus
3	and had your echo done?	3	myself. Did you did you talk with anybody to
4	A. Yes, it was before.	4	prepare for this deposition today?
5	Q. Okay. Because they're they're the ones	5	A. No.
6	that instructed you to get the echo, correct?	6	Q. No. Just talked to your attorney?
7	A. Right. Yes.	7	A. Yes.
8	Q. Okay. Do you remember if you had already	8	Q. Okay. Did you review any of the paperwork
9	signed on to be a client of theirs before you had the	9	that's in front of you this morning?
10	echo?	10	A. No. No more than you just showed me.
11	A. Yes.	11	Q. Did you look at anything else this morning
12	Q. You had. Okay. Do you remember did you	12	to prepare for your
13	try to talk did you talk to any other law firms	13	A. No.
14	A. No.	14	Q the deposition?
15	Q before you talked to them?	15	A. No.
16	A. No.	16	Q. Okay. Did you do anything anything else
17	Q. No. Okay. And the Colom firm has never	17	to prepare for the deposition yesterday?
18	represented you on anything before?	18	A. No.
19	A. No.	19	Q. Okay. Have you ever talked any of your
20	Q. Okay. Have they have they ever	20	doctors about bringing this lawsuit?
21	represented anyone in your family, that you know of?	21	A. No.
22	A. No.	22	Q. No. When you you said when you you
23	Q. Okay. Have you talked to have you	23	had heard of several other lawsuits before you
24	talked to anybody else in your family about whether	24	decided to bring your own, is that correct, involving
25	or not you should have hired them as a law firm?	25	diet drugs, Ms maybe Ms. Chandler's lawsuit or
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	Page 163		Page 165
1	A. No.	1	maybe Ms. Jones'?
2	A. No. Q. No. Okay. Have you done any any	2	maybe Ms. Jones'? A. Everything was done at the same time.
2	A. No.Q. No. Okay. Have you done any any independent research? You said you got on the	2	maybe Ms. Jones'? A. Everything was done at the same time. Every everybody went and checked out everything in
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. No. Q. No. Okay. Have you done any any independent research? You said you got on the Internet, and you looked up some of the diet drugs; is that correct? A. I don't know as I just looked it up. Just I just browsed through the Internet, you know, just reading like so. Q. Have you ever have you seen any anything on the Internet about some of the problems people have that took took any diet drugs? A. Not that I can recall. Q. Okay. Have you looked up any of your symptoms, like on the Internet? Have you looked up chest pain or shortness of breath or anything? A. No. Q. Okay. Have you ever been convicted of a crime? A. No. Q. Not a misdemeanor or felony? A. No. Q. Ever got a speeding ticket?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	maybe Ms. Jones'? A. Everything was done at the same time. Every everybody went and checked out everything in Macon. Q. Okay. A. Everything was done at the same time. You know, as far as, like, how far they went, I don't know. I just know we all went at the same time went met up in Macon just to hear about what was going on. And from there, what they did, I don't know. Q. Now, you said you went up did you go to a certain place? A. Yes. In Macon. Q. Where did where did y'all go in Macon? I mean, was there was there a meeting that was held that you attended? A. Yeah. It was just a meeting that was held, yeah. MS. TOLLE: I'm going to object right now because if I can have a minute just to ask her if it goes into the attorney-client privilege?

Deposition of Mary Sanders

MR. BLOUNT: That's fine. MR. BLOUNT: That's fine. MR. FORD: We'ne off the record. The time is 12:54 p.m. (After a recess, the deposition before the time is 12:54 p.m. MR. FORD: We'ne back on the record. The time is 12:03 p.m. MR. BLOUNT: Are you okay. Are you objecting to me asking about the meetings she attended? MR. BLOUNT: Are you okay. Are you objecting to me asking about the meetings she attended? MR. BLOUNT: Okay. MR. BLOUNT: Okay. MR. BLOUNT: Okay. MR. BLOUNT: Okay. MR. BLOUNT: Right. I understand. Q. (By Mr. Blount) The meeting - you said you attended or everybody was attending a meeting; but start correct? A. Yes. Q. Was that a lot of people you knew in Macon that were attending the meeting? A. Yes. Q. Okay. Was that meeting held by your Page 167 attorney? A. No. Q. Okay. A. It was just on it was talking about diet drugs? A. No. Q. Okay. A. A. Tu was a meeting someone was talking about diet drugs? A. No. Q. Okay. Who held who held the meeting? A. No. Q. When you attended that meeting, had you already signed up with an attorney? D. A. Right. Q. When you attended that meeting, had you already signed up with an attorney? A. No. Q. Okay. Who head who held the meeting? A. No. Q. Okay. Who head who held the meeting? A. No. Q. Okay. Who held who held the meeting? D. Okay. A. No. Q. Okay. Who held who held the meeting? A. No. Q. Okay. Who held who held the meeting? A. No. Q. Okay. Who held who held the meeting? A. No. Q. Okay. Who held who held the meeting? A. No. Q. Okay. Who held who held the meeting? A. No. Q. Okay. Who held who held the meeting? A. No. Q. Okay. Who held who held the meeting? A. No. Q. Okay. Who held who held the meeting? A. No. Q. Okay. Who held who held the meeting? A. No. Q. Okay. Who held who held the meeting? A. No. Q. Okay. Who was in charge? A. Yeah. A. Turnermber. I remember what I turned tower. I don't remember. A. No. It was one person. Q. Okay. A. No. It was one person. Q. Okay. A. No. It was one person. Q.		· · · · · · · · · · · · · · · · · · ·		
1 MR. RICOUNT: That's fine. 2 MR. FORD: We're off the record. The 3 time is 12:54 p.m. 4 (After a recess, the deposition 5 continued as follows:) 6 MR. FORD: We're back on the record. 7 The time is 1:03 p.m. 8 MR. BLOUNT: Are you - okay. Are you objecting to me asking about the meetings she 10 attended? 11 MR. BLOUNT: Okay. 12 fine line. 13 MR. BLOUNT: Okay. 14 MS. TOLLE: I'm - we're right at a 15 it starts - where she starts talking to her 15 it starts - where she starts talking to her 16 attorneys. 17 MR. BLOUNT: Right. I understand. 18 Q. (by Mr. Blount) The meeting - you said 19 you attended - or everybody was attending a meeting; 19 about diet arous? 20 Is that correct? 21 A. Yes. 22 Q. Was that a lot of people you knew in Macon 23 that were attending the meeting? 24 A. Yes. 25 Q. Okay. Was that meeting held by your Page 167 2 attorney? 2 attorney? 3 A. No. 3 Q. Okay. 4 A. It was just on it was talking about diet 4 drugs? 4 A. No. 4 Right. 5 Q. Okay. Who held who held the meeting, 14 A. No. 2 already signed up with an attorney? 2 A. No. 2 Q. Okay. Who held who held the meeting? 2 A. Peah. 3 A. Poon you know? Who was in charge? 4 A. Peah. 5 Q. Okay. 5 Q. Okay. 5 Q. Okay. 6 A. Say that one more time. 6 Q. Okay. Who held who held the meeting? 7 Q. Okay. Who held who held the meeting? 8 A. Poon you know? Who was in charge? 9 Do you know? Who was in charge? 10 Q. Okay. 11 A. Peah. 12 Q. Okay. 12 A. Yes. 13 A. No. 14 Q. Okay. Who held who held the meeting? 15 Do you know? Who was in charge? 16 Q. Deasiey & Allen? 17 A. The time is 12:59 p.m. 18 A. Peah. 19 Q. Okay. 20 Okay. 21 A. Yes. 22 Q. Okay. 23 A. No. 24 A. Te was a meeting you said 25 you remember did they tell you about lawsuits, or did the		Page 166	l	Page 168
time is 12:54 p.m. After a recess, the deposition MR. FORD: We're back on the record. The time is 1:03:54 p.m. MR. FORD: We're back on the record. The time is 1:03 p.m. MR. BLOUNT: Are you okay. Are you objecting to me asking about the meetings she attended? MR. BLOUNT: Okay. MR. BLOUNT: Okay. MR. BLOUNT: Right. I understand. Q. (By Mr. Blount) The meeting - you said you attended or everybody was attending a meeting; on that were attending the meeting? MR. BLOUNT: Right. I understand. Q. (By Mr. Blount) The meeting - you said you attended or everybody was attending a meeting; on that were attending the meeting? MR. BLOUNT: Right. I understand. Q. (By Mr. Blount) The meeting - you said you attended or everybody was attending a meeting; of that were attending the meeting? A. Yes. Q. Was that a lot of people you knew in Macon that were attending the meeting? A. Yes. Q. Okay. Was that meeting held by your Page 167 attorney? A. No. A. No. A. No. Q. Okay. Was it A and diet pills. A. It was a meeting someone was talking about diet drugs? A. It was a meeting someone was talking about diet drugs? A. It was a meeting someone was talking about diet drugs? A. Pes. Q. Okay. Was it A and diet pills. Q. When you attended that meeting, had you already signed up with an attorney? A. It was a meeting someone was talking about diet drugs? A. Pes. Q. Okay. Was it A and diet pills. A. No. Q. Okay. Was it A and diet pills. A. No. Q. Okay. Was it A and diet pills. A. No. Q. Okay. Was it A and diet pills. A. Pes. Q. Okay. Was it A and diet pills. A. Pes. Q. Okay. Was it A and diet pills. A. Pes. Q. Okay. Was it A and diet pills. A. Pes. Q. Okay. Was there a special synty diet drugs? A. Pes. Q. Okay. Vas it A and diet pills. A. Pes. Q. Okay. Vas it A and diet pills. A. Pes. Q. Okay. Do you remember did they tell you about diet drugs? A. It was something about diet drugs? A. It wa	1	=		
3 A. Well, basically, they were just saying, you (After a recess, the deposition (After a recess, the deposition continued as follows:) 5 continued as follows:) 6 MR. FORD: We're back on the record. 7 The time is 1:03 p.m. 8 MR. BLOUNT: Are you okay. Are you objecting to me asking about the meetings she attended? 10 attended? 11 MS. TOLLE: I'm we're right at a 12 fine line. 12 fine line. 13 MR. BLOUNT: Okay. 14 MS. TOLLE: I object to the point when 15 it starts where she starts talking to her attorneys. 16 Q. (By Mr. Blount) The meeting you said 19 you attended or everybody was attending a meeting; 19 A. Yes. 20 Q. Was that a lot of people you knew in Macon that were attending the meeting? 4. A. Yes. 21 A. Yes. 22 Q. Okay. Was that meeting held by your 23 A. No. 24 A. No. 3 Q. Okay. Was that meeting held by your 24 A. No. 3 Q. Okay. Was that meeting held by your 25 A. It was just on it was talking about diet drugs? 4 A. No. 4 A. It was just on it was talking about diet drugs? 5 Q. Okay. Who held who held the meeting? 19 Do you know? Who was in charge? 6 Q. Okay. Who held who held the meeting? 19 Do you know? Who was in charge? 7 A. Ro. 9 Q. Okay. Who held who held the meeting? 19 Okay. 10 Q. Okay. Who held who held the meeting? 19 Okay. 11 Q. When you attended that meeting, had you already signed up with an attorney? 12 A. No. 23 Conday. Was than attorney? 13 A. No. 24 A. No. 25 Q. Okay. Who held who held the meeting? 19 Okay. 26 A. Ro. 27 Q. Okay. Who held who held the meeting? 19 Okay. 28 A. Wesh. 39 Q. Okay. Who held who held the meeting? 19 Okay. 30 Q. Okay. Who held who held the meeting? 19 Okay. 31 A. No. 32 Q. Okay. Who held who held the meeting? 19 Okay. 32 A. Wesh. 33 A. No. 34 A. J. don't know is 1-10 go washing about the frugs. 35 A. You know, have you taken any diet drugs. 36 A. I'm who was in charge? 10 A. No. 10 C. Okay. 36 Q. Okay. 37 A. No. 11 Was a meeting you sald the you about health problems? 19 Okay. 38 A. No. 19 Okay. 49 A. No. 19 Okay. 50				· ·
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MR. BLOUNT: Are you okay. Are you objecting to me asking about the meetings she attended? MS. TOLLE: I'm we're right at a II MS. TOLLE: I'm we're right at a MR. BLOUNT: Okay. MR. BLOUNT: Okay. MR. BLOUNT: Right. I understand. C. (By Mr. Blount) The meeting you said you attended or everybody was attending a meeting; lis that correct? A. Yes. Q. Okay. Bo you remember what I turned over. I don't remember. I remember what I turned over. I don't remember. I remember what I turned over. I don't remember. It altorney: A. No. Q. Okay. When you about heath problems? A. No. Q. Do you know did they tell you about heath pr	1		1	
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Q. Was that a lot of people you knew in Macon that were attending the meeting? A. Yes. D. Okay. Was that meeting held by your Page 167 attorney? A. No. Q. Okay. A. No. Q. Okay. A. It was just on it was talking about diet drugs? A and diet pills. Q. Ut was a meeting someone was talking about diet drugs? A. Right. Q. When you attended that meeting, had you already signed up with an attorney? A. No. Q. Okay. Who held who held the meeting? Do you know? Who was in charge? A. Reasley & Allen. Q. Beasley & Allen. A. Yeah. Q. Are they are they a law firm? Q. Okay. A. I don't know if I don't know 20 Q. Okay. A. I contain the topic of conversation? A. A. Prescribed diet drugs. Q. What I'm sorry. What basically, what Page 169 A. Say that one more time. Q. What I'm sorry. What basically, what Page 169 A. Say that one more time. Q. What I'm sorry. What basically, what Page 169 Was the topic that they talked did they tell you about lawsuits, or did they tell you about? A. It was something about lawsuits. Q. Okay. A. Uh-huh (Indicating yes). Q. Okay. A. No. Q. Oyou know were they soliciting people to sign up to be plaintiffs? A. No. Q. Do you know did they were they did they at all, tell people what possible health problems they could have? A. No. Q. Do you know? A. No. Q. Do you know? A. No. Q. Do you remember any specific drugs that they may have talked about? A. No. Q. Do you remember. Q. Do you were talking about diet drugs? A. I don't remember. Q. What e I'm sorry. What basically, what Page 169 Was the topic that they talked did they tell you about lawsuits. A. It was something about lawsuits. A. It was something about lawsuits. A. No. Q. Okay. A. No. Q. Okay. A. No. Q. Did they do you know were they soliciting people to sign up to be plaintiffs? A. No. Q. Do you you promember any specific drugs they they are talking about diet drugs? A. I don't rememb	1			
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attorney? A. No. Q. Okay. A. It was just on it was talking about diet drugs A and diet pills. Q. It was a meeting someone was talking about diet drugs? A. Right. A. Right. A. Right. A. No. A. Right. A. No. Bassley & Allen. A. No. Q. Okay. Who held who held the meeting? A. Bassley & Allen. A. Bassley & Allen. A. Yeah. A. Yeah. A. It was something about lawsuits. A. No. Q. Okay. A. Uh-huh (Indicating yes). A. No. Q. Okay. A. No. Q. Okay. A. No. Q. Okay. A. No. A. No. A. No. A. No. A. No. Bassley & Allen. A. Beasley & Allen. A. Yeah. A. Yeah. A. Yeah. A. It was something about lawsuits. A. No. Q. Okay. A. No. Q. Okay. A. No. A. No. A. No. Bassley & Allen. A. Beasley & Allen. A. Yeah. A. Yeah. A. Yeah. A. I don't remember. A. I don't know if I don't know Q. Okay. A were they a law firm or I know it had something to do with legal action Q. Okay. A. Prescribed diet drugs. Q. What else happened at that meeting? What else did they I mean, did they talk for a while?				
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Q. Okay. Who held who held the meeting? Do you know? Who was in charge? A. Beasley & Allen. Q. Beasley & Allen? A. Yeah. Q. Are they are they a law firm? A. I don't know if I don't know Q. Okay. A were they a law firm or I know it had Q. Okay.	2 3 4 5 6 7 8 9 10	attorney? A. No. Q. Okay. A. It was just on it was talking about diet drugs Q. Okay. Was it A and diet pills. Q. It was a meeting someone was talking about diet drugs? A. Right. Q. When you attended that meeting, had you	2 3 4 5 6 7 8 9 10	was the topic that they talked did they tell you about? Did they tell you about lawsuits, or did they tell you about health problems? A. It was something about lawsuits. Q. Okay. A. Uh-huh (Indicating yes). Q. Did they do you know were they soliciting people to sign up to be plaintiffs? A. No. Q. Okay. A. No.
15 Do you know? Who was in charge? 16 A. Beasley & Allen. 17 Q. Beasley & Allen? 18 A. Yeah. 19 Q. Are they are they a law firm? 20 A. I don't know if I don't know 21 Q. Okay. 22 A were they a law firm or I know it had 23 something to do with legal action 24 Q. Okay. 25 A. No. 16 Q. Do you remember any specific drugs that 17 they may have talked about? 18 A. I don't remember. 19 Q. But they were talking about diet drugs? 20 A. Diet drugs. 21 Q. Okay. 22 A. Prescribed diet drugs. 23 Q. What else happened at that meeting? What 24 else did they I mean, did they talk for a while?	2 3 4 5 6 7 8 9 10 11 12	attorney? A. No. Q. Okay. A. It was just on it was talking about diet drugs Q. Okay. Was it A and diet pills. Q. It was a meeting someone was talking about diet drugs? A. Right. Q. When you attended that meeting, had you already signed up with an attorney?	2 3 4 5 6 7 8 9 10 11 12	was the topic that they talked did they tell you about? Did they tell you about lawsuits, or did they tell you about health problems? A. It was something about lawsuits. Q. Okay. A. Uh-huh (Indicating yes). Q. Did they do you know were they soliciting people to sign up to be plaintiffs? A. No. Q. Okay. A. No. Q. Do you know did they were they did
A. Beasley & Allen. Q. Beasley & Allen? 16 Q. Do you remember any specific drugs that they may have talked about? 18 A. Yeah. 19 Q. Are they are they a law firm? 20 A. I don't know if I don't know 20 A. Diet drugs. 21 Q. Okay. 22 A were they a law firm or I know it had something to do with legal action 24 Q. Okay. 23 Something to do with legal action 25 Q. What else happened at that meeting? What else did they I mean, did they talk for a while?	2 3 4 5 6 7 8 9 10 11 12 13	attorney? A. No. Q. Okay. A. It was just on it was talking about diet drugs Q. Okay. Was it A and diet pills. Q. It was a meeting someone was talking about diet drugs? A. Right. Q. When you attended that meeting, had you already signed up with an attorney? A. No.	2 3 4 5 6 7 8 9 10 11 12 13	was the topic that they talked did they tell you about? Did they tell you about lawsuits, or did they tell you about health problems? A. It was something about lawsuits. Q. Okay. A. Uh-huh (Indicating yes). Q. Did they do you know were they soliciting people to sign up to be plaintiffs? A. No. Q. Okay. A. No. Q. Do you know did they were they did they, at all, tell people what possible health
17 Q. Beasley & Allen? 18 A. Yeah. 19 Q. Are they are they a law firm? 20 A. I don't know if I don't know 21 Q. Okay. 22 A were they a law firm or I know it had 23 something to do with legal action 24 Q. Okay. 25 A. Yeah. 26 A. I don't remember. 27 Q. But they were talking about diet drugs? 28 A. Diet drugs. 29 A. Diet drugs. 20 A. Prescribed diet drugs. 21 Q. Okay. 22 A. Prescribed diet drugs. 23 Q. What else happened at that meeting? What else did they I mean, did they talk for a while?	2 3 4 5 6 7 8 9 10 11 12 13 14	attorney? A. No. Q. Okay. A. It was just on it was talking about diet drugs Q. Okay. Was it A and diet pills. Q. It was a meeting someone was talking about diet drugs? A. Right. Q. When you attended that meeting, had you already signed up with an attorney? A. No. Q. Okay. Who held who held the meeting?	2 3 4 5 6 7 8 9 10 11 12 13 14	was the topic that they talked did they tell you about? Did they tell you about lawsuits, or did they tell you about health problems? A. It was something about lawsuits. Q. Okay. A. Uh-huh (Indicating yes). Q. Did they do you know were they soliciting people to sign up to be plaintiffs? A. No. Q. Okay. A. No. Q. Do you know did they were they did they, at all, tell people what possible health problems they could have?
18 A. Yeah. 19 Q. Are they are they a law firm? 20 A. I don't know if I don't know 21 Q. Okay. 22 A were they a law firm or I know it had 23 something to do with legal action 24 Q. Okay. 25 A. Yeah. 26 A. I don't remember. 27 Q. But they were talking about diet drugs? 28 A. Diet drugs. 29 Q. Okay. 20 A. Prescribed diet drugs. 21 Q. What else happened at that meeting? What else did they I mean, did they talk for a while?	2 3 4 5 6 7 8 9 10 11 12 13 14 15	attorney? A. No. Q. Okay. A. It was just on it was talking about diet drugs Q. Okay. Was it A and diet pills. Q. It was a meeting someone was talking about diet drugs? A. Right. Q. When you attended that meeting, had you already signed up with an attorney? A. No. Q. Okay. Who held who held the meeting? Do you know? Who was in charge?	2 3 4 5 6 7 8 9 10 11 12 13 14 15	was the topic that they talked did they tell you about? Did they tell you about lawsuits, or did they tell you about health problems? A. It was something about lawsuits. Q. Okay. A. Uh-huh (Indicating yes). Q. Did they do you know were they soliciting people to sign up to be plaintiffs? A. No. Q. Okay. A. No. Q. Do you know did they were they did they, at all, tell people what possible health problems they could have? A. No.
19Q. Are they are they a law firm?19Q. But they were talking about diet drugs?20A. I don't know if I don't know20A. Diet drugs.21Q. Okay.21Q. Okay.22A were they a law firm or I know it had22A. Prescribed diet drugs.23something to do with legal action23Q. What else happened at that meeting? What24Q. Okay.24else did they I mean, did they talk for a while?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	attorney? A. No. Q. Okay. A. It was just on it was talking about diet drugs Q. Okay. Was it A and diet pills. Q. It was a meeting someone was talking about diet drugs? A. Right. Q. When you attended that meeting, had you already signed up with an attorney? A. No. Q. Okay. Who held who held the meeting? Do you know? Who was in charge? A. Beasley & Allen.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	was the topic that they talked did they tell you about? Did they tell you about lawsuits, or did they tell you about health problems? A. It was something about lawsuits. Q. Okay. A. Uh-huh (Indicating yes). Q. Did they do you know were they soliciting people to sign up to be plaintiffs? A. No. Q. Okay. A. No. Q. Do you know did they were they did they, at all, tell people what possible health problems they could have? A. No. Q. Do you remember any specific drugs that
20 A. I don't know if I don't know 21 Q. Okay. 22 A were they a law firm or I know it had 23 something to do with legal action 24 Q. Okay. 20 A. Diet drugs. 21 Q. Okay. 22 A. Prescribed diet drugs. 23 Q. What else happened at that meeting? What 24 else did they I mean, did they talk for a while?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	attorney? A. No. Q. Okay. A. It was just on it was talking about diet drugs Q. Okay. Was it A and diet pills. Q. It was a meeting someone was talking about diet drugs? A. Right. Q. When you attended that meeting, had you already signed up with an attorney? A. No. Q. Okay. Who held who held the meeting? Do you know? Who was in charge? A. Beasley & Allen. Q. Beasley & Allen?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	was the topic that they talked did they tell you about? Did they tell you about lawsuits, or did they tell you about health problems? A. It was something about lawsuits. Q. Okay. A. Uh-huh (Indicating yes). Q. Did they do you know were they soliciting people to sign up to be plaintiffs? A. No. Q. Okay. A. No. Q. Do you know did they were they did they, at all, tell people what possible health problems they could have? A. No. Q. Do you remember any specific drugs that they may have talked about?
 Q. Okay. Q. Okay. Q. Okay. Q. Okay. A were they a law firm or I know it had A. Prescribed diet drugs. Q. What else happened at that meeting? What Q. Okay. Q. Okay. Q. What else happened at that meeting? What Q. Okay. Q. Okay. 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	attorney? A. No. Q. Okay. A. It was just on it was talking about diet drugs Q. Okay. Was it A and diet pills. Q. It was a meeting someone was talking about diet drugs? A. Right. Q. When you attended that meeting, had you already signed up with an attorney? A. No. Q. Okay. Who held who held the meeting? Do you know? Who was in charge? A. Beasley & Allen. Q. Beasley & Allen? A. Yeah.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	was the topic that they talked did they tell you about? Did they tell you about lawsuits, or did they tell you about health problems? A. It was something about lawsuits. Q. Okay. A. Uh-huh (Indicating yes). Q. Did they do you know were they soliciting people to sign up to be plaintiffs? A. No. Q. Okay. A. No. Q. Okay. A. No. Q. Do you know did they were they did they, at all, tell people what possible health problems they could have? A. No. Q. Do you remember any specific drugs that they may have talked about? A. I don't remember.
22 A were they a law firm or I know it had 23 something to do with legal action 23 Q. What else happened at that meeting? What 24 Q. Okay. 22 A. Prescribed diet drugs. 23 Q. What else happened at that meeting? What 24 else did they I mean, did they talk for a while?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	attorney? A. No. Q. Okay. A. It was just on it was talking about diet drugs Q. Okay. Was it A and diet pills. Q. It was a meeting someone was talking about diet drugs? A. Right. Q. When you attended that meeting, had you already signed up with an attorney? A. No. Q. Okay. Who held who held the meeting? Do you know? Who was in charge? A. Beasley & Allen. Q. Beasley & Allen? A. Yeah. Q. Are they are they a law firm?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	was the topic that they talked did they tell you about? Did they tell you about lawsuits, or did they tell you about health problems? A. It was something about lawsuits. Q. Okay. A. Uh-huh (Indicating yes). Q. Did they do you know were they soliciting people to sign up to be plaintiffs? A. No. Q. Okay. A. No. Q. Do you know did they were they did they, at all, tell people what possible health problems they could have? A. No. Q. Do you remember any specific drugs that they may have talked about? A. I don't remember. Q. But they were talking about diet drugs?
22 A were they a law firm or I know it had 22 A. Prescribed diet drugs. 23 something to do with legal action 24 Q. Okay. 22 A. Prescribed diet drugs. 23 Q. What else happened at that meeting? What 24 else did they I mean, did they talk for a while?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	attorney? A. No. Q. Okay. A. It was just on it was talking about diet drugs Q. Okay. Was it A and diet pills. Q. It was a meeting someone was talking about diet drugs? A. Right. Q. When you attended that meeting, had you already signed up with an attorney? A. No. Q. Okay. Who held who held the meeting? Do you know? Who was in charge? A. Beasley & Allen. Q. Beasley & Allen? A. Yeah. Q. Are they are they a law firm?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	was the topic that they talked did they tell you about? Did they tell you about lawsuits, or did they tell you about health problems? A. It was something about lawsuits. Q. Okay. A. Uh-huh (Indicating yes). Q. Did they do you know were they soliciting people to sign up to be plaintiffs? A. No. Q. Okay. A. No. Q. Do you know did they were they did they, at all, tell people what possible health problems they could have? A. No. Q. Do you remember any specific drugs that they may have talked about? A. I don't remember. Q. But they were talking about diet drugs?
23 something to do with legal action 24 Q. Okay. 23 Q. What else happened at that meeting? What 24 else did they I mean, did they talk for a while?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	attorney? A. No. Q. Okay. A. It was just on it was talking about diet drugs Q. Okay. Was it A and diet pills. Q. It was a meeting someone was talking about diet drugs? A. Right. Q. When you attended that meeting, had you already signed up with an attorney? A. No. Q. Okay. Who held who held the meeting? Do you know? Who was in charge? A. Beasley & Allen. Q. Beasley & Allen? A. Yeah. Q. Are they are they a law firm? A. I don't know if I don't know	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	was the topic that they talked did they tell you about? Did they tell you about lawsuits, or did they tell you about health problems? A. It was something about lawsuits. Q. Okay. A. Uh-huh (Indicating yes). Q. Did they do you know were they soliciting people to sign up to be plaintiffs? A. No. Q. Okay. A. No. Q. Do you know did they were they did they, at all, tell people what possible health problems they could have? A. No. Q. Do you remember any specific drugs that they may have talked about? A. I don't remember. Q. But they were talking about diet drugs? A. Diet drugs.
24 Q. Okay. 24 else did they I mean, did they talk for a while?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	attorney? A. No. Q. Okay. A. It was just on it was talking about diet drugs Q. Okay. Was it A and diet pills. Q. It was a meeting someone was talking about diet drugs? A. Right. Q. When you attended that meeting, had you already signed up with an attorney? A. No. Q. Okay. Who held who held the meeting? Do you know? Who was in charge? A. Beasley & Allen. Q. Beasley & Allen? A. Yeah. Q. Are they are they a law firm? A. I don't know if I don't know Q. Okay.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	was the topic that they talked did they tell you about? Did they tell you about lawsuits, or did they tell you about health problems? A. It was something about lawsuits. Q. Okay. A. Uh-huh (Indicating yes). Q. Did they do you know were they soliciting people to sign up to be plaintiffs? A. No. Q. Okay. A. No. Q. Do you know did they were they did they, at all, tell people what possible health problems they could have? A. No. Q. Do you remember any specific drugs that they may have talked about? A. I don't remember. Q. But they were talking about diet drugs? A. Diet drugs. Q. Okay.
, , , , , , , , , , , , , , , , , , , ,	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	attorney? A. No. Q. Okay. A. It was just on it was talking about diet drugs Q. Okay. Was it A and diet pills. Q. It was a meeting someone was talking about diet drugs? A. Right. Q. When you attended that meeting, had you already signed up with an attorney? A. No. Q. Okay. Who held who held the meeting? Do you know? Who was in charge? A. Beasley & Allen. Q. Beasley & Allen? A. Yeah. Q. Are they are they a law firm? A. I don't know if I don't know Q. Okay. A were they a law firm or I know it had	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	was the topic that they talked did they tell you about? Did they tell you about lawsuits, or did they tell you about health problems? A. It was something about lawsuits. Q. Okay. A. Uh-huh (Indicating yes). Q. Did they do you know were they soliciting people to sign up to be plaintiffs? A. No. Q. Okay. A. No. Q. Do you know did they were they did they, at all, tell people what possible health problems they could have? A. No. Q. Do you remember any specific drugs that they may have talked about? A. I don't remember. Q. But they were talking about diet drugs? A. Diet drugs. Q. Okay. A. Prescribed diet drugs.
, , i i i i i i i i i i i i i i i i i i	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. No. Q. Okay. A. It was just on it was talking about diet drugs Q. Okay. Was it A and diet pills. Q. It was a meeting someone was talking about diet drugs? A. Right. Q. When you attended that meeting, had you already signed up with an attorney? A. No. Q. Okay. Who held who held the meeting? Do you know? Who was in charge? A. Beasley & Allen. Q. Beasley & Allen. Q. Beasley & Allen? A. Yeah. Q. Are they are they a law firm? A. I don't know if I don't know Q. Okay. A were they a law firm or I know it had something to do with legal action	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	was the topic that they talked did they tell you about? Did they tell you about lawsuits, or did they tell you about health problems? A. It was something about lawsuits. Q. Okay. A. Uh-huh (Indicating yes). Q. Did they do you know were they soliciting people to sign up to be plaintiffs? A. No. Q. Okay. A. No. Q. Do you know did they were they did they, at all, tell people what possible health problems they could have? A. No. Q. Do you remember any specific drugs that they may have talked about? A. I don't remember. Q. But they were talking about diet drugs? A. Diet drugs. Q. Okay. A. Prescribed diet drugs. Q. What else happened at that meeting? What
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	A. No. Q. Okay. A. It was just on it was talking about diet drugs Q. Okay. Was it A and diet pills. Q. It was a meeting someone was talking about diet drugs? A. Right. Q. When you attended that meeting, had you already signed up with an attorney? A. No. Q. Okay. Who held who held the meeting? Do you know? Who was in charge? A. Beasley & Allen. Q. Beasley & Allen? A. Yeah. Q. Are they are they a law firm? A. I don't know if I don't know Q. Okay. A were they a law firm or I know it had something to do with legal action Q. Okay.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	was the topic that they talked did they tell you about? Did they tell you about lawsuits, or did they tell you about health problems? A. It was something about lawsuits. Q. Okay. A. Uh-huh (Indicating yes). Q. Did they do you know were they soliciting people to sign up to be plaintiffs? A. No. Q. Okay. A. No. Q. Do you know did they were they did they, at all, tell people what possible health problems they could have? A. No. Q. Do you remember any specific drugs that they may have talked about? A. I don't remember. Q. But they were talking about diet drugs? A. Diet drugs. Q. Okay. A. Prescribed diet drugs. Q. What else happened at that meeting? What else did they I mean, did they talk for a while?

Deposition of Mary Sanders

		Janu	
	Page 170		Page 172
1	A. No.	1	Q. Okay.
2	Q. Do you remember what else any general or	2	MS. TOLLE: For the record, I'm I'm
3	any any specific things that the person would have	3	going to again state an objection. I'm not sure
4	said?	4	exactly who it was she spoke with at that point in
5	A. No. Basically, we just went down there,	5	time and want the objection on the record if it was
6	you know, and and signed up, and, you know, gave	6	at all connected with the Colom Law Firm.
7	them whatever you had. And that was it.	7	MR. BLOUNT: Okay.
8	Q. When you say you signed up, what were you	8	•
1	signing up for?		A. Well, they didn't mention Colom at all. I don't no.
9		9	
10	A. Well, you fill a piece of paper. I don't	10	Q. (By Mr. Blount) Do you remember ever
11	remember what I sign up for or like I said, I	11	getting a call back from any of those people from
12	don't know. I know he you know, he said give me	12	that person? Did you ever talk to them again?
13	prescribed diet drugs. And, you know, you're in the	13	A. I don't remember. I don't.
14	town of Macon. That's what we did.	14	Q. Do you remember if any of your if any of
15	Q. Okay. Did do you do you feel that	15	the people that were there that night, that you knew,
16	you were signing up to be represented by an attorney?	16	ever ended up talking to them again?
17	A. I don't know.	17	A. I don't know.
18	Q. You don't know?	18	Q. Okay.
19	A. I'm not sure.	19	A. I don't remember how I don't I don't
20	Q. Okay. Did the person promise you any	20	remember none of it.
21	money?	21	Q. All right. At what point did you can
22	A. No.	22	you remember back at what point you agreed to be a
23	Q. No. Did the person tell you that you were	23	client for the Colom Law Firm or agreed to hire them?
24	going to be bringing a lawsuit?	24	A. No.
25	A. I don't know.	25	Q. Did you did you meet with them and sign
1			
		ļ	
	Page 171		Page 173
1	Page 171 Q. Okay. Do you remember, at all, if they	1	Page 173 some paperwork saying, I want to be a that you're
1 2	=	1 2	
Ι.	Q. Okay. Do you remember, at all, if they	1	some paperwork saying, I want to be a that you're
2	Q. Okay. Do you remember, at all, if they talked about the Colom Law Firm?	2	some paperwork saying, I want to be a that you're going to represent me? A. I don't remember how it first I don't
2	Q. Okay. Do you remember, at all, if they talked about the Colom Law Firm? A. No.	2	some paperwork saying, I want to be a that you're going to represent me? A. I don't remember how it first I don't I know we signed up with one person, you know, signed
2 3 4	Q. Okay. Do you remember, at all, if they talked about the Colom Law Firm?A. No.Q. Okay.A. I don't remember that.	2 3 4	some paperwork saying, I want to be a that you're going to represent me? A. I don't remember how it first I don't I know we signed up with one person, you know, signed some papers. And it went from there. So
2 3 4 5	Q. Okay. Do you remember, at all, if they talked about the Colom Law Firm? A. No. Q. Okay. A. I don't remember that. Q. Do you remember if the individual that	2 3 4 5	some paperwork saying, I want to be a that you're going to represent me? A. I don't remember how it first I don't I know we signed up with one person, you know, signed some papers. And it went from there. So Q. Okay.
2 3 4 5 6 7	Q. Okay. Do you remember, at all, if they talked about the Colom Law Firm? A. No. Q. Okay. A. I don't remember that. Q. Do you remember if the individual thatthat y'all talked to, was he was he did he	2 3 4 5 6	some paperwork saying, I want to be a that you're going to represent me? A. I don't remember how it first I don't I know we signed up with one person, you know, signed some papers. And it went from there. So Q. Okay. A I don't know where it went from there.
2 3 4 5	Q. Okay. Do you remember, at all, if they talked about the Colom Law Firm? A. No. Q. Okay. A. I don't remember that. Q. Do you remember if the individual that that y'all talked to, was he was he did he address you as a group, or did he talk to you one on	2 3 4 5 6 7 8	some paperwork saying, I want to be a that you're going to represent me? A. I don't remember how it first I don't I know we signed up with one person, you know, signed some papers. And it went from there. So Q. Okay. A I don't know where it went from there. You know, even how it wound up here, I don't know.
2 3 4 5 6 7 8 9	Q. Okay. Do you remember, at all, if they talked about the Colom Law Firm? A. No. Q. Okay. A. I don't remember that. Q. Do you remember if the individual that that y'all talked to, was he was he did he address you as a group, or did he talk to you one on one?	2 3 4 5 6 7 8 9	some paperwork saying, I want to be a that you're going to represent me? A. I don't remember how it first I don't I know we signed up with one person, you know, signed some papers. And it went from there. So Q. Okay. A I don't know where it went from there. You know, even how it wound up here, I don't know. Q. Okay. All right. Do you remember if Ms.
2 3 4 5 6 7 8 9	Q. Okay. Do you remember, at all, if they talked about the Colom Law Firm? A. No. Q. Okay. A. I don't remember that. Q. Do you remember if the individual that that y'all talked to, was he was he did he address you as a group, or did he talk to you one on one? A. It was a group of us.	2 3 4 5 6 7 8 9 10	some paperwork saying, I want to be a that you're going to represent me? A. I don't remember how it first I don't I know we signed up with one person, you know, signed some papers. And it went from there. So Q. Okay. A I don't know where it went from there. You know, even how it wound up here, I don't know. Q. Okay. All right. Do you remember if Ms. Stallings was at that meeting you attended?
2 3 4 5 6 7 8 9 10	Q. Okay. Do you remember, at all, if they talked about the Colom Law Firm? A. No. Q. Okay. A. I don't remember that. Q. Do you remember if the individual that that y'all talked to, was he was he did he address you as a group, or did he talk to you one on one? A. It was a group of us. Q. Did he did he get up kind of like on a	2 3 4 5 6 7 8 9 10	some paperwork saying, I want to be a that you're going to represent me? A. I don't remember how it first I don't I know we signed up with one person, you know, signed some papers. And it went from there. So Q. Okay. A I don't know where it went from there. You know, even how it wound up here, I don't know. Q. Okay. All right. Do you remember if Ms. Stallings was at that meeting you attended? A. I don't know.
2 3 4 5 6 7 8 9 10 11	Q. Okay. Do you remember, at all, if they talked about the Colom Law Firm? A. No. Q. Okay. A. I don't remember that. Q. Do you remember if the individual that that y'all talked to, was he was he did he address you as a group, or did he talk to you one on one? A. It was a group of us. Q. Did he did he get up kind of like on a podium at church	2 3 4 5 6 7 8 9 10 11	some paperwork saying, I want to be a that you're going to represent me? A. I don't remember how it first I don't I know we signed up with one person, you know, signed some papers. And it went from there. So Q. Okay. A I don't know where it went from there. You know, even how it wound up here, I don't know. Q. Okay. All right. Do you remember if Ms. Stallings was at that meeting you attended? A. I don't know. Q. Did you go by yourself to that meeting, or
2 3 4 5 6 7 8 9 10 11 12 13	Q. Okay. Do you remember, at all, if they talked about the Colom Law Firm? A. No. Q. Okay. A. I don't remember that. Q. Do you remember if the individual that that y'all talked to, was he was he did he address you as a group, or did he talk to you one on one? A. It was a group of us. Q. Did he did he get up kind of like on a podium at church A. No.	2 3 4 5 6 7 8 9 10 11 12 13	some paperwork saying, I want to be a that you're going to represent me? A. I don't remember how it first I don't I know we signed up with one person, you know, signed some papers. And it went from there. So Q. Okay. A I don't know where it went from there. You know, even how it wound up here, I don't know. Q. Okay. All right. Do you remember if Ms. Stallings was at that meeting you attended? A. I don't know. Q. Did you go by yourself to that meeting, or did you go with somebody?
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q. Okay. Do you remember, at all, if they talked about the Colom Law Firm? A. No. Q. Okay. A. I don't remember that. Q. Do you remember if the individual that that y'all talked to, was he was he did he address you as a group, or did he talk to you one on one? A. It was a group of us. Q. Did he did he get up kind of like on a podium at church A. No. Q and talk to you? A. No. Q. So did people ask him questions and he	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	some paperwork saying, I want to be a that you're going to represent me? A. I don't remember how it first I don't I know we signed up with one person, you know, signed some papers. And it went from there. So Q. Okay. A I don't know where it went from there. You know, even how it wound up here, I don't know. Q. Okay. All right. Do you remember if Ms. Stallings was at that meeting you attended? A. I don't know. Q. Did you go by yourself to that meeting, or did you go with somebody? A. By myself. Q. You went yourself. Did you know a lot of people there?
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. Okay. Do you remember, at all, if they talked about the Colom Law Firm? A. No. Q. Okay. A. I don't remember that. Q. Do you remember if the individual that that y'all talked to, was he was he did he address you as a group, or did he talk to you one on one? A. It was a group of us. Q. Did he did he get up kind of like on a podium at church A. No. Q and talk to you? A. No. Q. So did people ask him questions and he answered them, or did he just give, like, a prepared speech?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	some paperwork saying, I want to be a that you're going to represent me? A. I don't remember how it first I don't I know we signed up with one person, you know, signed some papers. And it went from there. So Q. Okay. A I don't know where it went from there. You know, even how it wound up here, I don't know. Q. Okay. All right. Do you remember if Ms. Stallings was at that meeting you attended? A. I don't know. Q. Did you go by yourself to that meeting, or did you go with somebody? A. By myself. Q. You went yourself. Did you know a lot of people there? A. Well, you know, faces. Q. Do you remember if he talked at all about
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Q. Okay. Do you remember, at all, if they talked about the Colom Law Firm? A. No. Q. Okay. A. I don't remember that. Q. Do you remember if the individual that that y'all talked to, was he was he did he address you as a group, or did he talk to you one on one? A. It was a group of us. Q. Did he did he get up kind of like on a podium at church A. No. Q and talk to you? A. No. Q. So did people ask him questions and he answered them, or did he just give, like, a prepared speech? A. I don't know.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	some paperwork saying, I want to be a that you're going to represent me? A. I don't remember how it first I don't I know we signed up with one person, you know, signed some papers. And it went from there. So Q. Okay. A I don't know where it went from there. You know, even how it wound up here, I don't know. Q. Okay. All right. Do you remember if Ms. Stallings was at that meeting you attended? A. I don't know. Q. Did you go by yourself to that meeting, or did you go with somebody? A. By myself. Q. You went yourself. Did you know a lot of people there? A. Well, you know, faces. Q. Do you remember if he talked at all about the drug Pondimin?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. Okay. Do you remember, at all, if they talked about the Colom Law Firm? A. No. Q. Okay. A. I don't remember that. Q. Do you remember if the individual that that y'all talked to, was he was he did he address you as a group, or did he talk to you one on one? A. It was a group of us. Q. Did he did he get up kind of like on a podium at church A. No. Q and talk to you? A. No. Q. So did people ask him questions and he answered them, or did he just give, like, a prepared speech? A. I don't know. Q. Don't know. Do you remember talking to him	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	some paperwork saying, I want to be a that you're going to represent me? A. I don't remember how it first I don't I know we signed up with one person, you know, signed some papers. And it went from there. So Q. Okay. A I don't know where it went from there. You know, even how it wound up here, I don't know. Q. Okay. All right. Do you remember if Ms. Stallings was at that meeting you attended? A. I don't know. Q. Did you go by yourself to that meeting, or did you go with somebody? A. By myself. Q. You went yourself. Did you know a lot of people there? A. Well, you know, faces. Q. Do you remember if he talked at all about the drug Pondimin? A. No.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. Okay. Do you remember, at all, if they talked about the Colom Law Firm? A. No. Q. Okay. A. I don't remember that. Q. Do you remember if the individual that that y'all talked to, was he was he did he address you as a group, or did he talk to you one on one? A. It was a group of us. Q. Did he did he get up kind of like on a podium at church A. No. Q and talk to you? A. No. Q. So did people ask him questions and he answered them, or did he just give, like, a prepared speech? A. I don't know. Q. Don't know. Do you remember talking to him individually yourself?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	some paperwork saying, I want to be a that you're going to represent me? A. I don't remember how it first I don't I know we signed up with one person, you know, signed some papers. And it went from there. So Q. Okay. A I don't know where it went from there. You know, even how it wound up here, I don't know. Q. Okay. All right. Do you remember if Ms. Stallings was at that meeting you attended? A. I don't know. Q. Did you go by yourself to that meeting, or did you go with somebody? A. By myself. Q. You went yourself. Did you know a lot of people there? A. Well, you know, faces. Q. Do you remember if he talked at all about the drug Pondimin? A. No. Q. Okay. Do you remember if he talked at all
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. Okay. Do you remember, at all, if they talked about the Colom Law Firm? A. No. Q. Okay. A. I don't remember that. Q. Do you remember if the individual that that y'all talked to, was he was he did he address you as a group, or did he talk to you one on one? A. It was a group of us. Q. Did he did he get up kind of like on a podium at church A. No. Q and talk to you? A. No. Q. So did people ask him questions and he answered them, or did he just give, like, a prepared speech? A. I don't know. Q. Don't know. Do you remember talking to him individually yourself? A. Yes. Just, you know it was you know,	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	some paperwork saying, I want to be a that you're going to represent me? A. I don't remember how it first I don't I know we signed up with one person, you know, signed some papers. And it went from there. So Q. Okay. A I don't know where it went from there. You know, even how it wound up here, I don't know. Q. Okay. All right. Do you remember if Ms. Stallings was at that meeting you attended? A. I don't know. Q. Did you go by yourself to that meeting, or did you go with somebody? A. By myself. Q. You went yourself. Did you know a lot of people there? A. Well, you know, faces. Q. Do you remember if he talked at all about the drug Pondimin? A. No. Q. Okay. Do you remember if he talked at all about did he tell y'all anything about other
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. Okay. Do you remember, at all, if they talked about the Colom Law Firm? A. No. Q. Okay. A. I don't remember that. Q. Do you remember if the individual that that y'all talked to, was he was he did he address you as a group, or did he talk to you one on one? A. It was a group of us. Q. Did he did he get up kind of like on a podium at church A. No. Q and talk to you? A. No. Q. So did people ask him questions and he answered them, or did he just give, like, a prepared speech? A. I don't know. Q. Don't know. Do you remember talking to him individually yourself? A. Yes. Just, you know it was you know, it was a it was a lawsuit and you know, was	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	some paperwork saying, I want to be a that you're going to represent me? A. I don't remember how it first I don't I know we signed up with one person, you know, signed some papers. And it went from there. So Q. Okay. A I don't know where it went from there. You know, even how it wound up here, I don't know. Q. Okay. All right. Do you remember if Ms. Stallings was at that meeting you attended? A. I don't know. Q. Did you go by yourself to that meeting, or did you go with somebody? A. By myself. Q. You went yourself. Did you know a lot of people there? A. Well, you know, faces. Q. Do you remember if he talked at all about the drug Pondimin? A. No. Q. Okay. Do you remember if he talked at all about did he tell y'all anything about other lawsuits, successful lawsuits that have been filed?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Q. Okay. Do you remember, at all, if they talked about the Colom Law Firm? A. No. Q. Okay. A. I don't remember that. Q. Do you remember if the individual that that y'all talked to, was he was he did he address you as a group, or did he talk to you one on one? A. It was a group of us. Q. Did he did he get up kind of like on a podium at church A. No. Q and talk to you? A. No. Q. So did people ask him questions and he answered them, or did he just give, like, a prepared speech? A. I don't know. Q. Don't know. Do you remember talking to him individually yourself? A. Yes. Just, you know it was you know, it was a it was a lawsuit and you know, was there any prescribed drugs that was a prescribed	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	some paperwork saying, I want to be a that you're going to represent me? A. I don't remember how it first I don't I know we signed up with one person, you know, signed some papers. And it went from there. So Q. Okay. A I don't know where it went from there. You know, even how it wound up here, I don't know. Q. Okay. All right. Do you remember if Ms. Stallings was at that meeting you attended? A. I don't know. Q. Did you go by yourself to that meeting, or did you go with somebody? A. By myself. Q. You went yourself. Did you know a lot of people there? A. Well, you know, faces. Q. Do you remember if he talked at all about the drug Pondimin? A. No. Q. Okay. Do you remember if he talked at all about did he tell y'all anything about other lawsuits, successful lawsuits that have been filed? A. No.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. Okay. Do you remember, at all, if they talked about the Colom Law Firm? A. No. Q. Okay. A. I don't remember that. Q. Do you remember if the individual that that y'all talked to, was he was he did he address you as a group, or did he talk to you one on one? A. It was a group of us. Q. Did he did he get up kind of like on a podium at church A. No. Q and talk to you? A. No. Q. So did people ask him questions and he answered them, or did he just give, like, a prepared speech? A. I don't know. Q. Don't know. Do you remember talking to him individually yourself? A. Yes. Just, you know it was you know, it was a it was a lawsuit and you know, was	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	some paperwork saying, I want to be a that you're going to represent me? A. I don't remember how it first I don't I know we signed up with one person, you know, signed some papers. And it went from there. So Q. Okay. A I don't know where it went from there. You know, even how it wound up here, I don't know. Q. Okay. All right. Do you remember if Ms. Stallings was at that meeting you attended? A. I don't know. Q. Did you go by yourself to that meeting, or did you go with somebody? A. By myself. Q. You went yourself. Did you know a lot of people there? A. Well, you know, faces. Q. Do you remember if he talked at all about the drug Pondimin? A. No. Q. Okay. Do you remember if he talked at all about did he tell y'all anything about other lawsuits, successful lawsuits that have been filed?

Deposition of Mary Sanders

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1	had settled for large amounts of money?	1	Q. So you so you haven't hired any of those
2	A. No.	2	other people?
3	Q. Did he tell any of y'all that you would be	3	A. No. I just went to listen. No.
4	taking a echocardiogram test?	4	Q. Okay. Well, what what, then do you
5	A. No.	5	remember what the subject matters of those any of
6	Q. Is that the only meeting like that you	6	those meetings were?
7	attended?	7	A. Well no. That was involving my with
8	A. Yes.	8	my parents.
9	Q. Do you know of any other meetings that have	9	Q. Okay. You went with your parents?
10	occurred like that, maybe unrelated to diet drugs,	10	A. I basically just went with my parents.
11	just for other issues involving lawsuits?	11	Q. Did were those but were those
12	A. Yes.	12	those were other other similar gatherings where
13	Q. Have you attended any of those?	13	they were signing up people for lawsuits?
14	A. Yes.	14	A. Yes.
15	Q. Which what other ones have you attended?	15	Q. Okay. Can you remember, like, any of the
16	A. I can't think of none.	16	institutions they were looking into selling suing?
17	Q. Were there any	17	A. No.
18	A. I'd go	18	Q. Were they suing banks
19	Q others related to medicines?	19	A. I don't know.
20	A. No. No. No medicines. Just like	20	Q people that lend money?
21	financial stuff like that.	21	A. I don't know. I just went with them.
22	Q. Financial. Do you remember do you	22	Q. Okay. Do you know, are your parents
23	remember what any of that would have been?	23	involved in any lawsuits?
24	A. First Family and H & R Block.	24	A. (No response).
25	Q. Okay. Were these people talking about	25	Q. Are your parents involved in any lawsuits?
			
	Page 175		Page 177
1	bringing lawsuits?	1	A. Now?
2	bringing lawsuits? A. Yes.	2	A. Now? Q. Uh-huh (Indicating yes).
2	bringing lawsuits? A. Yes. Q. Do you remember what the what they were	2	A. Now? Q. Uh-huh (Indicating yes). A. No.
2 3 4	bringing lawsuits? A. Yes. Q. Do you remember what the what they were going to be suing over?	2 3 4	A. Now?Q. Uh-huh (Indicating yes).A. No.Q. Okay. Have have they been in the past?
2 3 4 5	bringing lawsuits? A. Yes. Q. Do you remember what the what they were going to be suing over? A. No.	2 3 4 5	A. Now?Q. Uh-huh (Indicating yes).A. No.Q. Okay. Have have they been in the past?A. Just that one.
2 3 4 5 6	bringing lawsuits? A. Yes. Q. Do you remember what the what they were going to be suing over? A. No. Q. Do you know if any of them talked about	2 3 4 5 6	 A. Now? Q. Uh-huh (Indicating yes). A. No. Q. Okay. Have have they been in the past? A. Just that one. Q. Just that one. Do you remember who they
2 3 4 5 6 7	bringing lawsuits? A. Yes. Q. Do you remember what the what they were going to be suing over? A. No. Q. Do you know if any of them talked about suing over mortgages or second mortgages?	2 3 4 5 6 7	 A. Now? Q. Uh-huh (Indicating yes). A. No. Q. Okay. Have have they been in the past? A. Just that one. Q. Just that one. Do you remember who they sued?
2 3 4 5 6 7 8	bringing lawsuits? A. Yes. Q. Do you remember what the what they were going to be suing over? A. No. Q. Do you know if any of them talked about suing over mortgages or second mortgages? A. Oh. You know, finances.	2 3 4 5 6 7 8	 A. Now? Q. Uh-huh (Indicating yes). A. No. Q. Okay. Have have they been in the past? A. Just that one. Q. Just that one. Do you remember who they sued? A. All I know was First Family.
2 3 4 5 6 7 8 9	bringing lawsuits? A. Yes. Q. Do you remember what the what they were going to be suing over? A. No. Q. Do you know if any of them talked about suing over mortgages or second mortgages? A. Oh. You know, finances. Q. Finances.	2 3 4 5 6 7 8 9	 A. Now? Q. Uh-huh (Indicating yes). A. No. Q. Okay. Have have they been in the past? A. Just that one. Q. Just that one. Do you remember who they sued? A. All I know was First Family. Q. It was First Family?
2 3 4 5 6 7 8 9	bringing lawsuits? A. Yes. Q. Do you remember what the what they were going to be suing over? A. No. Q. Do you know if any of them talked about suing over mortgages or second mortgages? A. Oh. You know, finances. Q. Finances. A. Yeah. You know, getting stuff financed.	2 3 4 5 6 7 8 9	 A. Now? Q. Uh-huh (Indicating yes). A. No. Q. Okay. Have have they been in the past? A. Just that one. Q. Just that one. Do you remember who they sued? A. All I know was First Family. Q. It was First Family? A. Yes.
2 3 4 5 6 7 8 9 10	bringing lawsuits? A. Yes. Q. Do you remember what the what they were going to be suing over? A. No. Q. Do you know if any of them talked about suing over mortgages or second mortgages? A. Oh. You know, finances. Q. Finances. A. Yeah. You know, getting stuff financed. Q. I guess	2 3 4 5 6 7 8 9 10	 A. Now? Q. Uh-huh (Indicating yes). A. No. Q. Okay. Have have they been in the past? A. Just that one. Q. Just that one. Do you remember who they sued? A. All I know was First Family. Q. It was First Family? A. Yes. Q. Do you know who represented them, what law
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2 3 4 5 6 7 8 9 10 11 12 13	bringing lawsuits? A. Yes. Q. Do you remember what the what they were going to be suing over? A. No. Q. Do you know if any of them talked about suing over mortgages or second mortgages? A. Oh. You know, finances. Q. Finances. A. Yeah. You know, getting stuff financed. Q. I guess MS. TOLLE: I'm going to direct you at this point	2 3 4 5 6 7 8 9 10 11 12 13	A. Now? Q. Uh-huh (Indicating yes). A. No. Q. Okay. Have have they been in the past? A. Just that one. Q. Just that one. Do you remember who they sued? A. All I know was First Family. Q. It was First Family? A. Yes. Q. Do you know who represented them, what law firm? A. Colom.
2 3 4 5 6 7 8 9 10 11 12 13 14	bringing lawsuits? A. Yes. Q. Do you remember what the what they were going to be suing over? A. No. Q. Do you know if any of them talked about suing over mortgages or second mortgages? A. Oh. You know, finances. Q. Finances. A. Yeah. You know, getting stuff financed. Q. I guess MS. TOLLE: I'm going to direct you at this point THE WITNESS: Okay.	2 3 4 5 6 7 8 9 10 11 12 13 14	 A. Now? Q. Uh-huh (Indicating yes). A. No. Q. Okay. Have have they been in the past? A. Just that one. Q. Just that one. Do you remember who they sued? A. All I know was First Family. Q. It was First Family? A. Yes. Q. Do you know who represented them, what law firm? A. Colom. Q. Colom. Okay. Would it have been your
2 3 4 5 6 7 8 9 10 11 12 13 14 15	bringing lawsuits? A. Yes. Q. Do you remember what the what they were going to be suing over? A. No. Q. Do you know if any of them talked about suing over mortgages or second mortgages? A. Oh. You know, finances. Q. Finances. A. Yeah. You know, getting stuff financed. Q. I guess MS. TOLLE: I'm going to direct you at this point THE WITNESS: Okay. MS. TOLLE: don't answer any	2 3 4 5 6 7 8 9 10 11 12 13 14 15	A. Now? Q. Uh-huh (Indicating yes). A. No. Q. Okay. Have have they been in the past? A. Just that one. Q. Just that one. Do you remember who they sued? A. All I know was First Family. Q. It was First Family? A. Yes. Q. Do you know who represented them, what law firm? A. Colom. Q. Colom. Okay. Would it have been your parents that told you, maybe you should call Colom
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	bringing lawsuits? A. Yes. Q. Do you remember what the what they were going to be suing over? A. No. Q. Do you know if any of them talked about suing over mortgages or second mortgages? A. Oh. You know, finances. Q. Finances. A. Yeah. You know, getting stuff financed. Q. I guess MS. TOLLE: I'm going to direct you at this point THE WITNESS: Okay. MS. TOLLE: don't answer any questions about any conversation you had with any	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A. Now? Q. Uh-huh (Indicating yes). A. No. Q. Okay. Have have they been in the past? A. Just that one. Q. Just that one. Do you remember who they sued? A. All I know was First Family. Q. It was First Family? A. Yes. Q. Do you know who represented them, what law firm? A. Colom. Q. Colom. Okay. Would it have been your parents that told you, maybe you should call Colom Law Firm for
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	bringing lawsuits? A. Yes. Q. Do you remember what the what they were going to be suing over? A. No. Q. Do you know if any of them talked about suing over mortgages or second mortgages? A. Oh. You know, finances. Q. Finances. A. Yeah. You know, getting stuff financed. Q. I guess MS. TOLLE: I'm going to direct you at this point THE WITNESS: Okay. MS. TOLLE: don't answer any questions about any conversation you had with any other attorneys THE WITNESS: Okay. MS. TOLLE: about any that you've hired for anything.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. Now? Q. Uh-huh (Indicating yes). A. No. Q. Okay. Have have they been in the past? A. Just that one. Q. Just that one. Do you remember who they sued? A. All I know was First Family. Q. It was First Family? A. Yes. Q. Do you know who represented them, what law firm? A. Colom. Q. Colom. Okay. Would it have been your parents that told you, maybe you should call Colom Law Firm for A. No. Q diet drugs? A. No. MS. TOLLE: Don't again, don't speculate if you don't know.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	bringing lawsuits? A. Yes. Q. Do you remember what the what they were going to be suing over? A. No. Q. Do you know if any of them talked about suing over mortgages or second mortgages? A. Oh. You know, finances. Q. Finances. A. Yeah. You know, getting stuff financed. Q. I guess MS. TOLLE: I'm going to direct you at this point THE WITNESS: Okay. MS. TOLLE: don't answer any questions about any conversation you had with any other attorneys THE WITNESS: Okay. MS. TOLLE: about any that you've hired for anything. Q. (By Mr. Blount) Have you have you hired any other attorneys for anything?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. Now? Q. Uh-huh (Indicating yes). A. No. Q. Okay. Have have they been in the past? A. Just that one. Q. Just that one. Do you remember who they sued? A. All I know was First Family. Q. It was First Family? A. Yes. Q. Do you know who represented them, what law firm? A. Colom. Q. Colom. Okay. Would it have been your parents that told you, maybe you should call Colom Law Firm for A. No. Q diet drugs? A. No. MS. TOLLE: Don't again, don't speculate if you don't know. Q. (By Mr. Blount) All right. So other than the other than the meeting you attended with
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	bringing lawsuits? A. Yes. Q. Do you remember what the what they were going to be suing over? A. No. Q. Do you know if any of them talked about suing over mortgages or second mortgages? A. Oh. You know, finances. Q. Finances. A. Yeah. You know, getting stuff financed. Q. I guess MS. TOLLE: I'm going to direct you at this point THE WITNESS: Okay. MS. TOLLE: don't answer any questions about any conversation you had with any other attorneys THE WITNESS: Okay. MS. TOLLE: about any that you've hired for anything. Q. (By Mr. Blount) Have you have you hired any other attorneys for anything? A. No. I mean, I was just listening.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. Now? Q. Uh-huh (Indicating yes). A. No. Q. Okay. Have have they been in the past? A. Just that one. Q. Just that one. Do you remember who they sued? A. All I know was First Family. Q. It was First Family? A. Yes. Q. Do you know who represented them, what law firm? A. Colom. Q. Colom. Okay. Would it have been your parents that told you, maybe you should call Colom Law Firm for A. No. Q diet drugs? A. No. MS. TOLLE: Don't again, don't speculate if you don't know. Q. (By Mr. Blount) All right. So other than

Deposition of Mary Sanders

lawsuit, have you attended any other large meetings like that? A. You know, actually, it wasn't meetings like that. They just they were just, you know, telling people about a lawsuit. Q. Right. Right. A. It had to do with that. Q. Any other any other inform information? A. No. That was just that one time. No. Q. Okay. Have you ever considered suing the doctor that prescribed your drugs to you? A. I don't know. Q. Dr. Henson? A. I don't know. I just take advice from my lawyer. I don't I don't know what's going on. Q. Okay. Would you sue your doctor if you thought you could win some money from him? MS. TOLLE: I object. MR. BLOUNT: It's not a conversation she's had with her attorney. Q. (By Mr. Blount) If did you okay. Let me rephrase that. Do you think do you think your physician did anything wrong in prescribing you diet drugs?	diet drugs, do you think that they they they did anything in that transaction that hurt you? A. I think if they was aware of it, you know. Q. If I'm sorry. Could you clarify what that, please? A. If they was aware of that, you know, it's going to cost people lives or any complications. Q. That that the pills could? A. Yes. Q. The pills they sold you? A. Right. Q. Do you and you don't remember seeing any kind of warning label? A. No. Q. Have you ever heard of any have you ever heard of the US Government wanting people that had taken diet drugs to go see a doctor? A. I don't recall. Q. Have you ever heard anyone say that the FDA wants people to go see a doctor who has who have taken diet drugs? A. I don't recall. Q. Have you ever seen a form or filled out a form involving this litigation called an opt-out form?
20 A. I don't know. I 21 Q. Okay. Do you think pharmacy that you 22 received the drugs at in Mobile did anything wrong? 23 A. I don't know. 24 Q. You don't know. Do you think do you	A. Yes. Q. Okay. Do you remember signing do you remember what it was called, if it was called an intermediate opt-out or a back-end opt-out? A. I don't remember. Q. But you do remember signing one? A. Yes. Q. Would you have turned that over to your attorney? A. I got it in the mail, and I mailed it back off. Q. Okay. MR. BLOUNT: We're going to have to hold up the deposition to get that. It hasn't been produced to us MS. TOLLE: Oh. MR. BLOUNT: I don't I don't believe. MS. TOLLE: I think we have it. MR. BLOUNT: Do you? MS. TOLLE: You guys don't have this? MR. BLOUNT: It was not sent to me, which and it's my understanding I have our our complete record. MS. TOLLE: (Counsel examines

Deposition of Mary Sanders

	Page 182		Page 184
1	documents).	1	goes with this. I can't remember what it's called.
2	MR. BLOUNT: If it if it helps,	2	Is this the only is this the only form you filled
3	Michelle, I haven't seen a back-end opt-out for	3	· · · · · · · · · · · · · · · · · · ·
1			out?
4	any any plaintiff in this case yet.	4	MS. TOLLE: Which one the fact
5	MS. TOLLE: I was trying to find a	5	sheet?
6	сору.	6	A. I don't remember. That's been so long ago.
7	MR. BLOUNT: If you have it, great.	7	Q. Okay. All right. All right.
8	MS. TOLLE: I thought we had provided	8	MS. TOLLE: Which one are you
9	that.	9	MR. BLOUNT: Is is there another
10	MR. BLOUNT: I'm not real sure I	10	form that do you know if there's another form that
11	don't know why we don't have any for this case, but I	11	goes with this, just that's more has more
12	haven't seen one.	12	biographical information and a list of providers that
13	MS. TOLLE: It was in my all right.	13	provided diet drugs?
14	Could we go off the record for a moment?	14	MS. TOLLE: It's not not on the
15	MR. BLOUNT: Sure.	15	fact sheet?
16	MR. FORD: We're off the record. The	1	
		16	MR. BLOUNT: I think it's got another
17	time is 1:17 p.m.	17	color name, like the blue form or the turquoise one.
18	(After a discussion off the record,	18	I'm not sure.
19	the deposition continued as follows:)	19	MS. TOLLE: It's not I don't see it
20	(Thereupon, the document hereinafter	20	in here.
21	referred to as Exhibit No. 5 was marked.)	21	MR. BLOUNT: This is the only one that
22	MR. FORD: We're back on the record.	22	I really need, but I was just curious.
23	The time is 1:21 p.m.	23	MS. TOLLE: Yeah. I don't
24	Q. (By Mr. Blount) All right, Ms. Sanders. I	24	MR. BLOUNT: Okay.
25	want to hand you Exhibit No. 5, which is called	25	MS. TOLLE: I'll check.
	,		i ioi i o e e e e e e e e e e e e e e e
	Page 193		Poss 10F
1	Page 183	1	Page 185
1 2	"ORANGE FORM #3."	1 2	Q. (By Mr. Blount) All right, Ms. Sanders.
2	"ORANGE FORM #3." A. Uh-huh (Indicating yes).	2	Q. (By Mr. Blount) All right, Ms. Sanders. We've talked about the doctor and the pharmacy. But
2	"ORANGE FORM #3." A. Uh-huh (Indicating yes). Q. And this is a diet drug settlement with	2 3	Q. (By Mr. Blount) All right, Ms. Sanders. We've talked about the doctor and the pharmacy. But obviously, the two pills were manufactured by
2 3 4	"ORANGE FORM #3." A. Uh-huh (Indicating yes). Q. And this is a diet drug settlement with American Home Products, Orange Form #3. It's the	2 3 4	Q. (By Mr. Blount) All right, Ms. Sanders. We've talked about the doctor and the pharmacy. But obviously, the two pills were manufactured by companies. Do you have do you claim anything was
2 3 4 5	"ORANGE FORM #3." A. Uh-huh (Indicating yes). Q. And this is a diet drug settlement with American Home Products, Orange Form #3. It's the back-end opt-out. It's on the top sentence there,	2 3	Q. (By Mr. Blount) All right, Ms. Sanders. We've talked about the doctor and the pharmacy. But obviously, the two pills were manufactured by companies. Do you have do you claim anything was done wrong by these companies in making those
2 3 4	"ORANGE FORM #3." A. Uh-huh (Indicating yes). Q. And this is a diet drug settlement with American Home Products, Orange Form #3. It's the	2 3 4	Q. (By Mr. Blount) All right, Ms. Sanders. We've talked about the doctor and the pharmacy. But obviously, the two pills were manufactured by companies. Do you have do you claim anything was
2 3 4 5	"ORANGE FORM #3." A. Uh-huh (Indicating yes). Q. And this is a diet drug settlement with American Home Products, Orange Form #3. It's the back-end opt-out. It's on the top sentence there,	2 3 4 5	Q. (By Mr. Blount) All right, Ms. Sanders. We've talked about the doctor and the pharmacy. But obviously, the two pills were manufactured by companies. Do you have do you claim anything was done wrong by these companies in making those making those pills you took?
2 3 4 5	"ORANGE FORM #3." A. Uh-huh (Indicating yes). Q. And this is a diet drug settlement with American Home Products, Orange Form #3. It's the back-end opt-out. It's on the top sentence there, underlined. Have you seen this form before? A. Yes.	2 3 4 5 6	Q. (By Mr. Blount) All right, Ms. Sanders. We've talked about the doctor and the pharmacy. But obviously, the two pills were manufactured by companies. Do you have do you claim anything was done wrong by these companies in making those making those pills you took? A. Only if it costs lives. That's all I know,
2 3 4 5 6 7	"ORANGE FORM #3." A. Uh-huh (Indicating yes). Q. And this is a diet drug settlement with American Home Products, Orange Form #3. It's the back-end opt-out. It's on the top sentence there, underlined. Have you seen this form before? A. Yes. Q. Okay. Do you remember signing it on the	2 3 4 5 6 7	Q. (By Mr. Blount) All right, Ms. Sanders. We've talked about the doctor and the pharmacy. But obviously, the two pills were manufactured by companies. Do you have do you claim anything was done wrong by these companies in making those making those pills you took? A. Only if it costs lives. That's all I know, you know. I don't know.
2 3 4 5 6 7 8 9	"ORANGE FORM #3." A. Uh-huh (Indicating yes). Q. And this is a diet drug settlement with American Home Products, Orange Form #3. It's the back-end opt-out. It's on the top sentence there, underlined. Have you seen this form before? A. Yes. Q. Okay. Do you remember signing it on the on the back page here, under No. 3?	2 3 4 5 6 7 8 9	Q. (By Mr. Blount) All right, Ms. Sanders. We've talked about the doctor and the pharmacy. But obviously, the two pills were manufactured by companies. Do you have do you claim anything was done wrong by these companies in making those making those pills you took? A. Only if it costs lives. That's all I know, you know. I don't know. Q. Okay. Have you been to see a doctor, other
2 3 4 5 6 7 8 9	"ORANGE FORM #3." A. Uh-huh (Indicating yes). Q. And this is a diet drug settlement with American Home Products, Orange Form #3. It's the back-end opt-out. It's on the top sentence there, underlined. Have you seen this form before? A. Yes. Q. Okay. Do you remember signing it on the on the back page here, under No. 3? A. Yes.	2 3 4 5 6 7 8 9	Q. (By Mr. Blount) All right, Ms. Sanders. We've talked about the doctor and the pharmacy. But obviously, the two pills were manufactured by companies. Do you have do you claim anything was done wrong by these companies in making those making those pills you took? A. Only if it costs lives. That's all I know, you know. I don't know. Q. Okay. Have you been to see a doctor, other than your gynecologist and the dentist, since you had
2 3 4 5 6 7 8 9 10	"ORANGE FORM #3." A. Uh-huh (Indicating yes). Q. And this is a diet drug settlement with American Home Products, Orange Form #3. It's the back-end opt-out. It's on the top sentence there, underlined. Have you seen this form before? A. Yes. Q. Okay. Do you remember signing it on the on the back page here, under No. 3? A. Yes. Q. Okay. That is your signature on October	2 3 4 5 6 7 8 9 10	Q. (By Mr. Blount) All right, Ms. Sanders. We've talked about the doctor and the pharmacy. But obviously, the two pills were manufactured by companies. Do you have do you claim anything was done wrong by these companies in making those making those pills you took? A. Only if it costs lives. That's all I know, you know. I don't know. Q. Okay. Have you been to see a doctor, other than your gynecologist and the dentist, since you had your echocardiogram done?
2 3 4 5 6 7 8 9 10 11 12	"ORANGE FORM #3." A. Uh-huh (Indicating yes). Q. And this is a diet drug settlement with American Home Products, Orange Form #3. It's the back-end opt-out. It's on the top sentence there, underlined. Have you seen this form before? A. Yes. Q. Okay. Do you remember signing it on the on the back page here, under No. 3? A. Yes. Q. Okay. That is your signature on October 24th, 2002?	2 3 4 5 6 7 8 9 10 11 12	Q. (By Mr. Blount) All right, Ms. Sanders. We've talked about the doctor and the pharmacy. But obviously, the two pills were manufactured by companies. Do you have do you claim anything was done wrong by these companies in making those making those pills you took? A. Only if it costs lives. That's all I know, you know. I don't know. Q. Okay. Have you been to see a doctor, other than your gynecologist and the dentist, since you had your echocardiogram done? A. No.
2 3 4 5 6 7 8 9 10 11 12 13	"ORANGE FORM #3." A. Uh-huh (Indicating yes). Q. And this is a diet drug settlement with American Home Products, Orange Form #3. It's the back-end opt-out. It's on the top sentence there, underlined. Have you seen this form before? A. Yes. Q. Okay. Do you remember signing it on the on the back page here, under No. 3? A. Yes. Q. Okay. That is your signature on October 24th, 2002? A. Yes.	2 3 4 5 6 7 8 9 10 11 12 13	Q. (By Mr. Blount) All right, Ms. Sanders. We've talked about the doctor and the pharmacy. But obviously, the two pills were manufactured by companies. Do you have do you claim anything was done wrong by these companies in making those making those pills you took? A. Only if it costs lives. That's all I know, you know. I don't know. Q. Okay. Have you been to see a doctor, other than your gynecologist and the dentist, since you had your echocardiogram done? A. No. Q. No?
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2 3 4 5 6 7 8 9 10 11 12 13 14 15	"ORANGE FORM #3." A. Uh-huh (Indicating yes). Q. And this is a diet drug settlement with American Home Products, Orange Form #3. It's the back-end opt-out. It's on the top sentence there, underlined. Have you seen this form before? A. Yes. Q. Okay. Do you remember signing it on the on the back page here, under No. 3? A. Yes. Q. Okay. That is your signature on October 24th, 2002? A. Yes. Q. Okay. And on the front of it, I just want to did you fill this information out? It's typed.	2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q. (By Mr. Blount) All right, Ms. Sanders. We've talked about the doctor and the pharmacy. But obviously, the two pills were manufactured by companies. Do you have do you claim anything was done wrong by these companies in making those making those pills you took? A. Only if it costs lives. That's all I know, you know. I don't know. Q. Okay. Have you been to see a doctor, other than your gynecologist and the dentist, since you had your echocardiogram done? A. No. Q. No? A. Baptist Memorial. Q. Baptist Memorial?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	"ORANGE FORM #3." A. Uh-huh (Indicating yes). Q. And this is a diet drug settlement with American Home Products, Orange Form #3. It's the back-end opt-out. It's on the top sentence there, underlined. Have you seen this form before? A. Yes. Q. Okay. Do you remember signing it on the on the back page here, under No. 3? A. Yes. Q. Okay. That is your signature on October 24th, 2002? A. Yes. Q. Okay. And on the front of it, I just want to did you fill this information out? It's typed. Is your name typed here?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q. (By Mr. Blount) All right, Ms. Sanders. We've talked about the doctor and the pharmacy. But obviously, the two pills were manufactured by companies. Do you have do you claim anything was done wrong by these companies in making those making those pills you took? A. Only if it costs lives. That's all I know, you know. I don't know. Q. Okay. Have you been to see a doctor, other than your gynecologist and the dentist, since you had your echocardiogram done? A. No. Q. No? A. Baptist Memorial. Q. Baptist Memorial? A. Yeah. That's when I was having bad chest
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Deposition of Mary Sanders

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	Page 186		Page 188
1	Q. Do you remember telling them, hey, I've	1	A. I don't know.
2	had I've had a heart test done before? Did you	2	Q. Okay. All right. That's all I have.
3	tell them	3	Thank you.
4	A. No.	4	MS. TOLLE: All right. You guys, did
5	Q. Okay. You didn't tell them about your	5	you have some questions, on the phone?
6	echo, then?	6	MS. LADNER: I have a few.
7	A. No. But I was so unh-unh (Indicating	7	MS. TOLLE: Okay. I don't I mean,
8	no). I didn't even think about that.	8	
9	•		whichever order you guys want to go in.
	Q. All right. Do you about how long after	9	MS. LADNER: That's fine. Emilie, why
10	that was was your visit to Baptist?	10	don't you go first?
11	A. I don't remember. I remember that echo was	11	MS. WHITEHEAD: Okay.
12	a while ago. It was a long time ago.	12	MS. TOLLE: Can you guys hear okay?
13	Q. Was it has it been a over a year	13	MR. BROUILLETTE: Yes.
14	since you went to Baptist?	14	MS. TOLLE: Okay.
15	A. I went to Baptist I was really trying to	15	EXAMINATION
16	remember, was I working with was I working with	16	BY MS. WHITEHEAD:
17	512 or Brenda's Cutting Edge. I know it was back in	17	Q. Ms. Sanders, can you hear me?
18	Macon.	18	A. Yes.
19	Q. Okay. Has it be within the past 12 months,	19	Q. My name is Emilie Whitehead. I have a few
20	though?	20	questions to ask you this afternoon. I'm looking at
21	A. No.	21	your two pharmacy records, one for Kmart, showing a
22	Q. Okay. Has any attorney told you to go see	22	prescription for showing a prescription for
23	a doctor other than the echocardiogram	23	Remeron, I believe, in March of '99. It is correct
24	A. No.	24	that you got the phentermine prescription filled in
25	Q you had done?	25	February of '99 and the Remeron prescription filled
	Q. you had done:	23	rebridary or 33 and the Kemeron prescription filled
		_	
1	Dogo 197		P. 100
1	Page 187	1	Page 189
1 2	A. No.	1 2	in March of '99?
2	A. No.Q. What other additional treatments do you	2	in March of '99? MS. TOLLE: Are you talking about the
2	A. No.Q. What other additional treatments do you think you're going to need as a result of taking diet	2	in March of '99? MS. TOLLE: Are you talking about the B & O sheet?
2 3 4	A. No. Q. What other additional treatments do you think you're going to need as a result of taking diet drugs?	2 3 4	in March of '99? MS. TOLLE: Are you talking about the B & O sheet? MS. WHITEHEAD: Yes.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. No. Q. What other additional treatments do you think you're going to need as a result of taking diet drugs? MS. TOLLE: I object to the extent that it calls for a medical conclusion, and she wouldn't know. Q. (By Mr. Blount) Do you think you're going to need to be hospitalized in the future because of your heart and your heart pains? A. I don't know. Q. Don't know. Do you think you're going to need to take any medicine? A. If it continues like this, yes. Q. Okay. Are you are you seeking to recover the price you paid for the drugs you bought? A. I don't know. Q. As far as if you win the lawsuit, are are you hoping that you'll get the money back that you paid for the diet drugs, get your money back for something that hurt you? A. Rephrase that again. Q. I'm sorry. Are are in in this	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	in March of '99? MS. TOLLE: Are you talking about the B & O sheet? MS. WHITEHEAD: Yes. MS. TOLLE: Okay. Not the Kmart. Do you know which one she's talking about? THE WITNESS: Yes. MS. TOLLE: Okay. MS. WHITEHEAD: Well, Michelle, I'm actually talking about one. The the phentermine is on the Kmart list, and the Remeron is on the B & O list. MS. TOLLE: Okay. So we're looking at both of them. MS. WHITEHEAD: Right. Q. (By Ms. Whitehead) And as I understand it, Ms. Sanders, you had the prescription for the phentermine filled at the Kmart pharmacy on February the 8th of 1999. You had the prescription for Remeron filled at B & O Pharmacy in March of 1999. And I am just wondering if that is correct? A. Yes, ma'am. Q. As I understand it, Dr. Denzil Robertson is

Deposition of Mary Sanders

	Page 190		Page 192
1	 Q. And it's your testimony today that at that 	1	Q. Do you recall whether it was a capsule, a
2	time, you were having some chest pains, and that	2	tablet, or a pill?
3	precipitated your visit to Dr. Robertson and the	3	A. I don't remember.
4	receipt of the Remeron?	4	Q. And as I understand it, when you took the
5	A. Yes.	5	diet drugs, you had a feeling of heart racing and
6	Q. Did you discuss any anxiety that you were	6	that sort of thing; is that correct?
7	having with Dr. Robertson at that time?	7	A. Yes.
8	MS. TOLLE: I object to the form.	8	Q. Do you still have those symptoms today?
9	Q. (By Ms. Whitehead) When you visited with	9	A. Yes.
10	Dr. Robertson prior to his giving you the Remeron	10	Q. And you still associate those symptoms with
11	prescription, were you experiencing symptoms of	11	having taken diet drugs in 1999?
12	anxiety?	12	A. I don't know.
13	A. I was. Yes.	13	
14		14	Q. Okay. Do you remember any words or
15	Q. Were you experiencing symptoms of sadness		markings on the diet drugs?
	or loss of enjoyment of life?	15	A. No.
16	A. Yes.	16	Q. Other than the peach drug, you do not
17	Q. Did Dr. Robertson describe or diagnose you	17	recall what the other drugs what the color of the
18	with having an anxiety attack or a panic attack?	18	other drug was; is that correct?
19	A. No, ma'am. Not that I can recall.	19	A. Yes.
20	Q. Do you recall if he diagnosed you with	20	Q. Have you ever had any communications with a
21	suffering from depression?	21	company called Goldline Pharmaceuticals?
22	A. Definitely no.	22	A. No.
23	Q. No. Are are you aware of what the	23	Q. Have you ever had any communications with a
24	prescription Remeron is prescribed for?	24	company called Rugby Laboratories?
25	A. No, ma'am.	25	A. No.
1		1	
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	Page 191		Page 193
1	Q. He did not indicate to you why he was	1	Page 193 Q. Have either of those companies ever made
2	Q. He did not indicate to you why he was giving you that prescription?	2	
	Q. He did not indicate to you why he was giving you that prescription?A. No.	1	Q. Have either of those companies ever made any representations to you about any drug? A. No.
2	Q. He did not indicate to you why he was giving you that prescription?A. No.Q. In March of 1999 or February of 1999, did	2	Q. Have either of those companies ever made any representations to you about any drug?
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Deposition of Mary Sanders

			
	Page 194	1	Page 196
1	MS. WHITEHEAD: Thank you, Ms.	1	16th, 2004. The time is 1:36 p.m. We're off the
2	Sanders.	2	record.
3	THE WITNESS: Thank you.	3	(Whereupon, the deposition was
4	EXAMINATION	4	concluded at 1:36 p.m.)
5	BY MS. LADNER:	5	, , , , , , , , , , , , , , , , , , ,
6	Q. Ms. Sanders, I'm Lynn Ladner. I've got	6	
7	just a couple of very quick questions. I want to	7	
8	clarify, did you ever receive any diet drug	8	
9	medication prescriptions from any doctor other than	9	
10	Dr. Henson?	10	
11	A. No.		
		11	
12	Q. Did you ever pick up any prescriptions for	12	
13	diet drug medications from any pharmacy other than	13	
14	the Wal-Mart in Mobile?	14	
15	A. No.	15	
16	Q. And have you ever had any communications	16	
17	with SmithKline Beecham?	17	
18	MS. TOLLE: I just want to clarify.	18	
19	On your last question, you asked about Wal-Mart.	19	
20	MS. LADNER: Yes, ma'am.	20	
21	THE WITNESS: I never went to	21	
22	Wal-Mart. It was Kmart.	22	
23	MS. TOLLE: Okay. Could you say that	23	
24	for the record?	24	
25	A. Oh. I've never been to Wal-Mart. It was	25	
			I I
	Page 195		Page 197
1	Page 195 Kmart.	1	Page 197 CERTIFICATE OF COURT REPORTER
1 2	Kmart.	1 2	CERTIFICATE OF COURT REPORTER
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Deposition of Mary Sanders

Deposition of Brenda Stallings

		Page 1
1	IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DIVISION OF PENNSYLVANIA	J
2		
3	IN RE DIET DRUGS MDL NO. 1203 (PHENTERMINE/)	
4	FENFLURAMINE/DEXFENFLURAMINE) PRODUCTS LIABILITY LITIGATION	
5	PRODUCTS LIABILITY LITTGATION	
6	BRENDA STALLINGS, ET AL. PLAINTIFFS	
7	v. CIVIL ACTION NO. 2:02cv20118	
8	WYETH, ET AL. DEFENDANTS	
9		
10	****************	
11	VIDEO DEPOSITION OF BRENDA M. STALLINGS	
12		
13		
14	APPEARANCES NOTED HEREIN	
15		
16		
17	Taken at the instance of Wyeth	
18	at Page Kruger & Holland, Jackson, Mississippi Monday, June 28, 2004	
19	beginning at approximately 10:06 a.m.	
20		
21		
22	KELLYE S. SHOWS, CSR MS CSR #1290	
23	Bond & Associates	İ
24	Post Office Box 320666 Jackson, Mississippi 39232	
25	(601) 936-4466	

Deposition of Brenda Stallings

	Brenda	Stall	ii igs
	Page 2		Page 4
1	APPEARANCES	1	it when you answered it. Okay?
2	MR. BRANDON I. DORSEY	2	A. Okay.
	Page, Kruger & Holland	3	Q. And, Ms. Stallings, you understand that
4	10 Canebrake Boulevard Jackson, Mississippi 39232	4	you have been sworn to tell the truth here this
5	COUNSEL FOR PLAINTIFF	5	morning by the court reporter?
6	MD 100HHA I METHED	1	- •
7	MR. JOSHUA J. WIENER Butler Snow O'Mara Stevens & Cannada	6	A. Yes.
	AmSouth Plaza, 17th Floor	7	Q. And you understand that your testimony
8	Jackson, Mississippi 39201 COUNSEL FOR WYETH	8	here this morning even though we're not in a
9	COUNSELTOR WILTH	9	courtroom, you understand that you're giving
10	MR. KEN MANSFIELD	10	testimony under oath in your case that you have
11	Wells Marble & Hurst 317 East Capitol Street	11	filed?
	Jackson, Mississippi 39201	12	A. Yes.
12 13	COUNSEL FOR GATE PHARMACEUTICALS	13	Q. All right. And you understand that you
13	MS. MOLLY WALKER	14	are subject to the penalty of perjury in the event
14	Watkins & Eager	15	any of your testimony would be deemed to be untrue?
15	400 East Capitol Street Jackson, Mississippi 39201	16	A. Okay. Yes.
İ	COUNSEL FOR SMITHKLINE BEACHAM	17	Q. All right. Let me also tell you,
16 17	MS. KAARA LIND	18	
1/	Page Mannino Peresich & McDermott		Ms. Stallings, we're going to be here awhile. It's
18	1105 30th Avenue	19	going to take awhile to get through all of the
19	Gulfport, Mississippi 39501 COUNSEL FOR GOLDLINE LABORATORIES AND	20	information that I need to cover with you. So if at
	RUGBY LABORATORIES	21	any time you need to take a break please let me know
20 21	ALSO PRESENT: GARY RICHARDSON, VIDEOGRAPHER	22	and I'll be happy to accommodate you, and we'll take
22	ALSO MESERY. GART RELIGION, VIDEOURA HER	23	a break and give you a chance to get a drink of
23 24		24	water or rest or whatever.
25		25	A. Okay.
	Page 3		Page 5
1	BRENDA M. STALLINGS,	1	Q. And I probably will need to take a break
2	having been first duly sworn, was	2	myself along the way.
3	examined and testified as follows:	3	· · · · · · · · · · · · · · · · · · ·
4	EXAMINATION		A. Okay.
5	BY MR. WIENER:	4	Q. All right.
		5	MR. WIENER: First of all, I'd like to
6	Q. Would you state your full name, please.	6	mark as the first deposition exhibit the Notice of
/	A. Brenda M. Stallings.	7	Depositions that includes the taking of this
8	Q. Ms. Stallings, my name is Josh Wiener.	8	deposition. It was originally scheduled for May 27,
9	I'm a lawyer in Jackson, Mississippi; and I	9	2004. And, Brandon, it's my understanding that it
10	represent a company named Wyeth. I'm going to be	10	was postponed and rescheduled for this date with
11	I'm going to be taking your deposition this morning	11	agreement of all counsel?
12	which amounts to my asking you questions about the	12	MR. DORSEY: Yes, that's correct.
13	claim that you have submitted pertaining to your	13	MR. WIENER: Let me get that marked as
14	taking of diet drugs. Do you understand that?	14	Exhibit 1, please. Let me show it to Brandon
15	A. Yes, sir.	15	first.
16	Q. All right. And let me tell you that if I	16	(EXHIBIT NO. 1 MARKED.)
17	ask you any question in a way that is unclear to you	17	MR. WIENER:
18	and you're not sure what I'm asking or you need for	18	Q. And, Ms. Stallings, I'm going to show you
19	me to rephrase my question or clarify what I'm	19	what I believe is the fact sheet that you prepared
20	asking, please let me know and I'll be happy to do	20	and which was filed in MDL No. 1203. I'm going to
21	so. Okay?	21	
22	A. Okay.		show it to your attorney first and then have him
23	Q. And if you go ahead and answer my	22	hand it to you. Thank you. Okay. All right.
24		23	Ms. Stallings, if you'll take a look at
25	question and you don't ask me to clarify it or rephrase it I'm going to assume that you understood	24	that, I'd like you to look through each page and
	reprirase it itii yoniy to assume that you understood	25	familiarize yourself with that document.
23	,		

Deposition of Brenda Stallings

June 28, 2004

Page 6 Page 8 1 A. (Reviewed document.) Am I taking too 1 MR. DORSEY: That's fine. 2 long? 2 MR. WIENER: 3 No, that's fine. All right. 3 Q. Ms. Stallings, have you ever given a Q. 4 Ms. Stallings, have you had an opportunity to look 4 deposition before? 5 through each page of the document that I just handed 5 A. Yes. 6 to you? 6 All right. What -- do you remember what 7 Α. 7 case your deposition was taken in? 8 Q. And do you recognize that as a 8 A. It was a discrimination lawsuit. 9 Plaintiff's Fact Sheet that you completed in 9 All right. And were you the plaintiff in Ο. connection with your pursuit of a claim that's 10 10 that case? connected with your taking of diet drugs? 11 11 A. Yes. 12 Α. Yes. 12 Were there any other plaintiffs? Q. 13 All right. Is the handwriting on that Q. 13 Α. 14 form your own handwriting? 14 Do you remember who you were suing at Q. 15 Α. Yes. 15 that time? 16 Q. Did anyone assist you in completing that 16 A. Macon Police Department. 17 form? 17 O. When -- when was that suit filed? 18 A. No. 18 A. I'm not sure on dates. Q. And after you completed the form, who did 19 19 Q. Can you give me a rough estimate. I 20 vou send it to? 20 won't hold you to it, but.... A. Here, Page, Kruger & Holland. 21 21 A. I believe it was in '93. I'm not Q. All right. 22 22 certain. 23 MR. WIENER: With that, let me get 23 But it's been --Q. 24 Ms. Stallings' fact sheet marked as Exhibit No. 2, 24 Α. It's been a while. 25 please. 25 O. -- a long time ago? Page 7 Page 9 (EXHIBIT NO. 2 MARKED.) 1 1 Α. Yes, it has. 2 MR. WIENER: 2 Q. Was the case filed in Federal Court to 3 Q. Ms. Stallings, at the time that you 3 the best of your knowledge? 4 completed this fact sheet were you satisfied that 4 A. It never made it to court. 5 the information that you had put on the fact sheet 5 Q. I see. Did you bring a claim at the EEOC was true and accurate to the best of your knowledge 6 6 against --7 and belief? 7 A. Yes. 8 A. Yes, to the best of my knowledge. 8 -- the Macon Police Department? Q. 9 Q. All right. And does that appear to be a 9 A. Yes. 10 complete and accurate copy of the fact sheet that 10 Q. What office of the EEOC did you use in 11 you submitted on that occasion? making your complaint? 11 12 A. Yes, sir. A. I think it was the discrimination 12 13 MR. WIENER: Brandon, I neglected to 13 office. I'm not sure. 14 cover with you preliminaries before we began the 14 I'm asking you where was the EEOC office taking of the deposition. Of course, the deposition 15 15 where you filed your complaint. I know there's one is being taken pursuant to the Federal Rules of 16 16 here in Jackson, but it's possible that you 17 Civil Procedure. Can we have an agreement that all 17 submitted it somewhere else. 18 objections will be reserved except as to the form of 18 A. It was Jackson. 19 the question? 19 Q. It was in Jackson? MR. DORSEY: Yes. 20 20 A. Yes, it was. 21 MR. WIENER: And also, Brandon, I 21 And the responding party was the Macon Q. 22 mentioned that I represented Wyeth, and, of course, 22 Police Department? 23 that company was previously known as American Home 23 Yes. A. Products. I would also be representing any Wyeth 24 Were you an employee of the Macon Police 24 Q. 25 entities that may have been named in the Complaint. 25 Department?

Deposition of Brenda Stallings

	Page 10		Page 12
1	A. No.	1	pending that you gave a deposition?
2	Q. All right. Give me a summary of what	2	 A. Let me see can I answer that.
3	your claim was about.	3	Q. Okay.
4	 A. They didn't hire women. They had a 	4	A. I don't remember how that actually went.
5	problem with hiring women. They had all men. And I	5	I don't really recall the procedures totally. I
6	had filled out an application for a job and got	6	don't know.
7	denied. I didn't even get an interview.	7	Q. Do you still have a file about that claim
8	Q. I see.	8	at your home?
9	A. I filed a claim.	9	A. No, I don't.
10	Q. So your claim was discrimination based on	10	Q. Did you give sworn testimony in a format
11	gender	11	that's similar to what we have today? In other
12	A. Uh-huh.	12	words, was there a court reporter present who was
13	Q based on the Macon Police Department	13	typing down what you said?
14	not hiring you when you applied?	14	A. Yes.
15	A. Right. Yes.	15	Q. All right. And your attorney Mr.
16	Q. And did you have an attorney in making	16	Bombock
17	that claim?	17	A. Bambach.
18	A. Yes.	18	Q Bambach, he was there with you when
19	Q. Who was your attorney?	19	your testimony was taken?
20	A. William Bambach.	20	A. Yes.
21	Q. Okay. And what was the outcome of your	21	Q. And do you remember the lawyer that asked
22	claim against the Macon Police Department?	22	you the questions?
23	A. It wasn't enough evidence to prove that	23	·
24	it was discrimination.	24	,
25	Q. Okay. Did the EEOC dismiss your charge	25	Q. He was representing the Macon Police
23	Q. Oldy. Did the ELOC distribs your charge	23	Department?
	Page 11		Page 13
1	or make a finding that there was no cause to support	1	A. Yes, sir.
2	your charge?	2	Q. I have seen on various documents the name
3	A. Yes. Yes.	3	Brenda M. Stallings. Is that correct?
4	Q. You remember that the EEOC basically	4	A. Uh-huh.
5	turned you down on that?	5	Q. What does the "M" stand for?
6	A. Yes.	6	A. Macon.
7	Q. And did you pursue any appeal or do	7	Q. All right. And before you were Brenda
8	anything further after the EEOC denied your claim?	8	
l	differing faraler after the LLOC defiled your claim:		Stallings did you have another name?
19	Δ No		Stallings, did you have another name?
9	A. No. O You didn't receive any type of settlement	9	A. I was Brenda Cunningham.
10	Q. You didn't receive any type of settlement	9 10	A. I was Brenda Cunningham.Q. And when did you become Brenda Stallings
10 11	Q. You didn't receive any type of settlement or money from the Macon Police Department?	9 10 11	A. I was Brenda Cunningham.Q. And when did you become Brenda Stallings and why did your name change at that time?
10 11 12	Q. You didn't receive any type of settlement or money from the Macon Police Department? A. No.	9 10 11 12	 A. I was Brenda Cunningham. Q. And when did you become Brenda Stallings and why did your name change at that time? A. I remarried, and it was in '96 1996.
10 11 12 13	Q. You didn't receive any type of settlement or money from the Macon Police Department?A. No.Q. Now, I believe you told me you had had	9 10 11 12 13	 A. I was Brenda Cunningham. Q. And when did you become Brenda Stallings and why did your name change at that time? A. I remarried, and it was in '96 1996. Q. All right. And what was your name at
10 11 12 13 14	 Q. You didn't receive any type of settlement or money from the Macon Police Department? A. No. Q. Now, I believe you told me you had had your deposition taken before and that it was in that 	9 10 11 12 13 14	 A. I was Brenda Cunningham. Q. And when did you become Brenda Stallings and why did your name change at that time? A. I remarried, and it was in '96 1996. Q. All right. And what was your name at birth?
10 11 12 13 14 15	 Q. You didn't receive any type of settlement or money from the Macon Police Department? A. No. Q. Now, I believe you told me you had had your deposition taken before and that it was in that case. 	9 10 11 12 13 14 15	 A. I was Brenda Cunningham. Q. And when did you become Brenda Stallings and why did your name change at that time? A. I remarried, and it was in '96 1996. Q. All right. And what was your name at birth? A. Brenda Lee Macon.
10 11 12 13 14 15 16	 Q. You didn't receive any type of settlement or money from the Macon Police Department? A. No. Q. Now, I believe you told me you had had your deposition taken before and that it was in that case. A. Uh-huh. 	9 10 11 12 13 14 15 16	 A. I was Brenda Cunningham. Q. And when did you become Brenda Stallings and why did your name change at that time? A. I remarried, and it was in '96 1996. Q. All right. And what was your name at birth? A. Brenda Lee Macon. Q. Brenda Lee Macon?
10 11 12 13 14 15 16 17	Q. You didn't receive any type of settlement or money from the Macon Police Department? A. No. Q. Now, I believe you told me you had had your deposition taken before and that it was in that case. A. Uh-huh. Q. Is that correct?	9 10 11 12 13 14 15 16 17	 A. I was Brenda Cunningham. Q. And when did you become Brenda Stallings and why did your name change at that time? A. I remarried, and it was in '96 1996. Q. All right. And what was your name at birth? A. Brenda Lee Macon. Q. Brenda Lee Macon? A. Uh-huh.
10 11 12 13 14 15 16 17	Q. You didn't receive any type of settlement or money from the Macon Police Department? A. No. Q. Now, I believe you told me you had had your deposition taken before and that it was in that case. A. Uh-huh. Q. Is that correct? A. Yes.	9 10 11 12 13 14 15 16 17 18	 A. I was Brenda Cunningham. Q. And when did you become Brenda Stallings and why did your name change at that time? A. I remarried, and it was in '96 1996. Q. All right. And what was your name at birth? A. Brenda Lee Macon. Q. Brenda Lee Macon? A. Uh-huh. Q. All right. And then was Cunningham a
10 11 12 13 14 15 16 17 18 19	 Q. You didn't receive any type of settlement or money from the Macon Police Department? A. No. Q. Now, I believe you told me you had had your deposition taken before and that it was in that case. A. Uh-huh. Q. Is that correct? A. Yes. Q. So you actually gave sworn testimony? 	9 10 11 12 13 14 15 16 17 18 19	 A. I was Brenda Cunningham. Q. And when did you become Brenda Stallings and why did your name change at that time? A. I remarried, and it was in '96 1996. Q. All right. And what was your name at birth? A. Brenda Lee Macon. Q. Brenda Lee Macon? A. Uh-huh. Q. All right. And then was Cunningham a married name?
10 11 12 13 14 15 16 17 18 19 20	 Q. You didn't receive any type of settlement or money from the Macon Police Department? A. No. Q. Now, I believe you told me you had had your deposition taken before and that it was in that case. A. Uh-huh. Q. Is that correct? A. Yes. Q. So you actually gave sworn testimony? A. Yes. 	9 10 11 12 13 14 15 16 17 18 19 20	 A. I was Brenda Cunningham. Q. And when did you become Brenda Stallings and why did your name change at that time? A. I remarried, and it was in '96 1996. Q. All right. And what was your name at birth? A. Brenda Lee Macon. Q. Brenda Lee Macon? A. Uh-huh. Q. All right. And then was Cunningham a married name? A. Yes.
10 11 12 13 14 15 16 17 18 19 20 21	 Q. You didn't receive any type of settlement or money from the Macon Police Department? A. No. Q. Now, I believe you told me you had had your deposition taken before and that it was in that case. A. Uh-huh. Q. Is that correct? A. Yes. Q. So you actually gave sworn testimony? A. Yes. Q. And to the best of your knowledge, was 	9 10 11 12 13 14 15 16 17 18 19 20 21	 A. I was Brenda Cunningham. Q. And when did you become Brenda Stallings and why did your name change at that time? A. I remarried, and it was in '96 1996. Q. All right. And what was your name at birth? A. Brenda Lee Macon. Q. Brenda Lee Macon? A. Uh-huh. Q. All right. And then was Cunningham a married name? A. Yes. Q. All right. When did you marry
10 11 12 13 14 15 16 17 18 19 20 21 22	 Q. You didn't receive any type of settlement or money from the Macon Police Department? A. No. Q. Now, I believe you told me you had had your deposition taken before and that it was in that case. A. Uh-huh. Q. Is that correct? A. Yes. Q. So you actually gave sworn testimony? A. Yes. Q. And to the best of your knowledge, was that sworn testimony given within the confines of 	9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. I was Brenda Cunningham. Q. And when did you become Brenda Stallings and why did your name change at that time? A. I remarried, and it was in '96 1996. Q. All right. And what was your name at birth? A. Brenda Lee Macon. Q. Brenda Lee Macon? A. Uh-huh. Q. All right. And then was Cunningham a married name? A. Yes. Q. All right. When did you marry Mr. Cunningham?
10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. You didn't receive any type of settlement or money from the Macon Police Department? A. No. Q. Now, I believe you told me you had had your deposition taken before and that it was in that case. A. Uh-huh. Q. Is that correct? A. Yes. Q. So you actually gave sworn testimony? A. Yes. Q. And to the best of your knowledge, was that sworn testimony given within the confines of the EEOC charge? In other words, what I'm asking	9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. I was Brenda Cunningham. Q. And when did you become Brenda Stallings and why did your name change at that time? A. I remarried, and it was in '96 1996. Q. All right. And what was your name at birth? A. Brenda Lee Macon. Q. Brenda Lee Macon? A. Uh-huh. Q. All right. And then was Cunningham a married name? A. Yes. Q. All right. When did you marry Mr. Cunningham? A. In 1989.
10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Q. You didn't receive any type of settlement or money from the Macon Police Department? A. No. Q. Now, I believe you told me you had had your deposition taken before and that it was in that case. A. Uh-huh. Q. Is that correct? A. Yes. Q. So you actually gave sworn testimony? A. Yes. Q. And to the best of your knowledge, was that sworn testimony given within the confines of the EEOC charge? In other words, what I'm asking you is, did you have a did you have a claim on	9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	A. I was Brenda Cunningham. Q. And when did you become Brenda Stallings and why did your name change at that time? A. I remarried, and it was in '96 1996. Q. All right. And what was your name at birth? A. Brenda Lee Macon. Q. Brenda Lee Macon? A. Uh-huh. Q. All right. And then was Cunningham a married name? A. Yes. Q. All right. When did you marry Mr. Cunningham? A. In 1989. Q. And how did your marriage to him
10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. You didn't receive any type of settlement or money from the Macon Police Department? A. No. Q. Now, I believe you told me you had had your deposition taken before and that it was in that case. A. Uh-huh. Q. Is that correct? A. Yes. Q. So you actually gave sworn testimony? A. Yes. Q. And to the best of your knowledge, was that sworn testimony given within the confines of the EEOC charge? In other words, what I'm asking	9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. I was Brenda Cunningham. Q. And when did you become Brenda Stallings and why did your name change at that time? A. I remarried, and it was in '96 1996. Q. All right. And what was your name at birth? A. Brenda Lee Macon. Q. Brenda Lee Macon? A. Uh-huh. Q. All right. And then was Cunningham a married name? A. Yes. Q. All right. When did you marry Mr. Cunningham? A. In 1989.

Deposition of Brenda Stallings

	Page 14		Page 16
1	A. Yes.	1	A we were separated for about six months.
2	Q. And was it by divorce?	2	 Q. All right. So you had two periods during
3	A. Yes, divorce.	3	your marriage of being separated?
4	Q. When did you and Mr. Cunningham become	4	A. Yes.
5	divorced?	5	Q. And are the two of you reconciled now?
6	A. 1992.	6	A. Yes.
7	Q. And do you remember where the divorce was	Ž	Q. Have you had any children with
8	handled what court it was handled in?	8	Mr. Stallings?
9	A. No, I don't.	9	A. No.
10	Q. Did you have an attorney on that	10	
11	occasion?		Q. Did you have any children with
12		11	Mr. Cunningham?
	A. That was William Bambach also who did it.	12	A. Yes.
13	Q. Where were you living at the time of that	13	Q. If you would, tell me the names and ages
14	divorce?	14	of the children that you had with Mr. Cunningham.
15	A. In Macon.	15	A. Okay. My daughter Shereka is 19, my son
16	 Q. All right. So do you think it might have 	16	Christopher is 18, and my son Demarcus who is 14.
17	been handled at the Noxubee County Chancery Court?	17	Q. And all three of those are children that
18	A. We didn't go to court.	18	you had with Mr. Cunningham?
19	Q. Okay. And then you say you married in	19	A. Yes, sir.
20	1996 and became Brenda Stallings.	20	Q. What's Mr. Cunningham's first name?
21	A. Yes.	21	A. Larry.
22	Q. All right. And are you still married to	22	•
23	Mr. Stallings?	23	_
24	A. Yes.	24	A. In Columbus, Mississippi.
25			Q. Does he continue to have a relationship
23	Q. What does he do for a living?	25	with his children?
	Page 15		
	Lade 13		
1	A. He works at a chemical plant. I don't	1	Page 17 A. No.
1 2	A. He works at a chemical plant. I don't		A. No.
2	A. He works at a chemical plant. I don't know exactly what his job title is.	2	A. No.Q. Do you ever see him?
2	A. He works at a chemical plant. I don't know exactly what his job title is. Q. All right. What's the name of the	2	A. No.Q. Do you ever see him?A. Occasionally. Not a lot.
2 3 4	A. He works at a chemical plant. I don't know exactly what his job title is.Q. All right. What's the name of the chemical plant?	2 3 4	A. No.Q. Do you ever see him?A. Occasionally. Not a lot.Q. And where do your three children reside
2 3 4 5	A. He works at a chemical plant. I don't know exactly what his job title is. Q. All right. What's the name of the chemical plant? A. Kerr Magee Chemicals.	2 3 4 5	A. No.Q. Do you ever see him?A. Occasionally. Not a lot.Q. And where do your three children reside at the current time?
2 3 4 5 6	 A. He works at a chemical plant. I don't know exactly what his job title is. Q. All right. What's the name of the chemical plant? A. Kerr Magee Chemicals. Q. Where is that located? 	2 3 4 5 6	 A. No. Q. Do you ever see him? A. Occasionally. Not a lot. Q. And where do your three children reside at the current time? A. They live with me.
2 3 4 5 6 7	 A. He works at a chemical plant. I don't know exactly what his job title is. Q. All right. What's the name of the chemical plant? A. Kerr Magee Chemicals. Q. Where is that located? A. In Hamilton, Mississippi. 	2 3 4 5 6 7	 A. No. Q. Do you ever see him? A. Occasionally. Not a lot. Q. And where do your three children reside at the current time? A. They live with me. Q. And have each of them completed school or
2 3 4 5 6 7 8	A. He works at a chemical plant. I don't know exactly what his job title is. Q. All right. What's the name of the chemical plant? A. Kerr Magee Chemicals. Q. Where is that located? A. In Hamilton, Mississippi. Q. And has Mr. Stallings been doing been	2 3 4 5 6 7 8	 A. No. Q. Do you ever see him? A. Occasionally. Not a lot. Q. And where do your three children reside at the current time? A. They live with me. Q. And have each of them completed school or are they in school?
2 3 4 5 6 7 8 9	A. He works at a chemical plant. I don't know exactly what his job title is. Q. All right. What's the name of the chemical plant? A. Kerr Magee Chemicals. Q. Where is that located? A. In Hamilton, Mississippi. Q. And has Mr. Stallings been doing been working for that company since you married in 1996?	2 3 4 5 6 7 8	 A. No. Q. Do you ever see him? A. Occasionally. Not a lot. Q. And where do your three children reside at the current time? A. They live with me. Q. And have each of them completed school or are they in school? A. Shereka is in college and Christopher
2 3 4 5 6 7 8 9	A. He works at a chemical plant. I don't know exactly what his job title is. Q. All right. What's the name of the chemical plant? A. Kerr Magee Chemicals. Q. Where is that located? A. In Hamilton, Mississippi. Q. And has Mr. Stallings been doing been working for that company since you married in 1996? A. Yes.	2 3 4 5 6 7 8 9	 A. No. Q. Do you ever see him? A. Occasionally. Not a lot. Q. And where do your three children reside at the current time? A. They live with me. Q. And have each of them completed school or are they in school? A. Shereka is in college and Christopherboth the other two are still in school.
2 3 4 5 6 7 8 9 10	A. He works at a chemical plant. I don't know exactly what his job title is. Q. All right. What's the name of the chemical plant? A. Kerr Magee Chemicals. Q. Where is that located? A. In Hamilton, Mississippi. Q. And has Mr. Stallings been doing been working for that company since you married in 1996? A. Yes. Q. All right. Have the two of you continued	2 3 4 5 6 7 8 9 10	 A. No. Q. Do you ever see him? A. Occasionally. Not a lot. Q. And where do your three children reside at the current time? A. They live with me. Q. And have each of them completed school or are they in school? A. Shereka is in college and Christopherboth the other two are still in school. Q. Seniors?
2 3 4 5 6 7 8 9 10 11	A. He works at a chemical plant. I don't know exactly what his job title is. Q. All right. What's the name of the chemical plant? A. Kerr Magee Chemicals. Q. Where is that located? A. In Hamilton, Mississippi. Q. And has Mr. Stallings been doing been working for that company since you married in 1996? A. Yes. Q. All right. Have the two of you continued to reside together continuously since your marriage?	2 3 4 5 6 7 8 9 10 11	 A. No. Q. Do you ever see him? A. Occasionally. Not a lot. Q. And where do your three children reside at the current time? A. They live with me. Q. And have each of them completed school or are they in school? A. Shereka is in college and Christopherboth the other two are still in school. Q. Seniors? A. Christopher is a senior this year and
2 3 4 5 6 7 8 9 10 11 12 13	A. He works at a chemical plant. I don't know exactly what his job title is. Q. All right. What's the name of the chemical plant? A. Kerr Magee Chemicals. Q. Where is that located? A. In Hamilton, Mississippi. Q. And has Mr. Stallings been doing been working for that company since you married in 1996? A. Yes. Q. All right. Have the two of you continued to reside together continuously since your marriage? A. On and off. On and off.	2 3 4 5 6 7 8 9 10	 A. No. Q. Do you ever see him? A. Occasionally. Not a lot. Q. And where do your three children reside at the current time? A. They live with me. Q. And have each of them completed school or are they in school? A. Shereka is in college and Christopherboth the other two are still in school. Q. Seniors?
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A. He works at a chemical plant. I don't know exactly what his job title is. Q. All right. What's the name of the chemical plant? A. Kerr Magee Chemicals. Q. Where is that located? A. In Hamilton, Mississippi. Q. And has Mr. Stallings been doing been working for that company since you married in 1996? A. Yes. Q. All right. Have the two of you continued to reside together continuously since your marriage? A. On and off. On and off. Q. On and off? A. Yes. Q. There have been periods of time that you	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	 A. No. Q. Do you ever see him? A. Occasionally. Not a lot. Q. And where do your three children reside at the current time? A. They live with me. Q. And have each of them completed school or are they in school? A. Shereka is in college and Christopherboth the other two are still in school. Q. Seniors? A. Christopher is a senior this year and Demarcus is going to the ninth grade. Q. All right. Thank you. Have you had any other marriages other than to Mr. Cunningham and Mr. Stallings?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A. He works at a chemical plant. I don't know exactly what his job title is. Q. All right. What's the name of the chemical plant? A. Kerr Magee Chemicals. Q. Where is that located? A. In Hamilton, Mississippi. Q. And has Mr. Stallings been doing been working for that company since you married in 1996? A. Yes. Q. All right. Have the two of you continued to reside together continuously since your marriage? A. On and off. On and off. Q. On and off? A. Yes.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	 A. No. Q. Do you ever see him? A. Occasionally. Not a lot. Q. And where do your three children reside at the current time? A. They live with me. Q. And have each of them completed school or are they in school? A. Shereka is in college and Christopherboth the other two are still in school. Q. Seniors? A. Christopher is a senior this year and Demarcus is going to the ninth grade. Q. All right. Thank you. Have you had any other marriages other than to Mr. Cunningham and Mr. Stallings? A. No, sir.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. He works at a chemical plant. I don't know exactly what his job title is. Q. All right. What's the name of the chemical plant? A. Kerr Magee Chemicals. Q. Where is that located? A. In Hamilton, Mississippi. Q. And has Mr. Stallings been doing been working for that company since you married in 1996? A. Yes. Q. All right. Have the two of you continued to reside together continuously since your marriage? A. On and off. On and off. Q. On and off? A. Yes. Q. There have been periods of time that you all have been separated? A. Yes.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	 A. No. Q. Do you ever see him? A. Occasionally. Not a lot. Q. And where do your three children reside at the current time? A. They live with me. Q. And have each of them completed school or are they in school? A. Shereka is in college and Christopherboth the other two are still in school. Q. Seniors? A. Christopher is a senior this year and Demarcus is going to the ninth grade. Q. All right. Thank you. Have you had any other marriages other than to Mr. Cunningham and Mr. Stallings? A. No, sir. Q. And have you had any other children than
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A. He works at a chemical plant. I don't know exactly what his job title is. Q. All right. What's the name of the chemical plant? A. Kerr Magee Chemicals. Q. Where is that located? A. In Hamilton, Mississippi. Q. And has Mr. Stallings been doing been working for that company since you married in 1996? A. Yes. Q. All right. Have the two of you continued to reside together continuously since your marriage? A. On and off. On and off. Q. On and off? A. Yes. Q. There have been periods of time that you all have been separated? A. Yes. Q. Can you tell me give me a best	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	 A. No. Q. Do you ever see him? A. Occasionally. Not a lot. Q. And where do your three children reside at the current time? A. They live with me. Q. And have each of them completed school or are they in school? A. Shereka is in college and Christopherboth the other two are still in school. Q. Seniors? A. Christopher is a senior this year and Demarcus is going to the ninth grade. Q. All right. Thank you. Have you had any other marriages other than to Mr. Cunningham and Mr. Stallings? A. No, sir. Q. And have you had any other children than the three children that you've talked about?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. He works at a chemical plant. I don't know exactly what his job title is. Q. All right. What's the name of the chemical plant? A. Kerr Magee Chemicals. Q. Where is that located? A. In Hamilton, Mississippi. Q. And has Mr. Stallings been doing been working for that company since you married in 1996? A. Yes. Q. All right. Have the two of you continued to reside together continuously since your marriage? A. On and off. On and off. Q. On and off? A. Yes. Q. There have been periods of time that you all have been separated? A. Yes. Q. Can you tell me give me a best judgment or best estimate of when of the periods	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	 A. No. Q. Do you ever see him? A. Occasionally. Not a lot. Q. And where do your three children reside at the current time? A. They live with me. Q. And have each of them completed school or are they in school? A. Shereka is in college and Christopherboth the other two are still in school. Q. Seniors? A. Christopher is a senior this year and Demarcus is going to the ninth grade. Q. All right. Thank you. Have you had any other marriages other than to Mr. Cunningham and Mr. Stallings? A. No, sir. Q. And have you had any other children than the three children that you've talked about? A. No, sir.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. He works at a chemical plant. I don't know exactly what his job title is. Q. All right. What's the name of the chemical plant? A. Kerr Magee Chemicals. Q. Where is that located? A. In Hamilton, Mississippi. Q. And has Mr. Stallings been doing been working for that company since you married in 1996? A. Yes. Q. All right. Have the two of you continued to reside together continuously since your marriage? A. On and off. On and off. Q. On and off? A. Yes. Q. There have been periods of time that you all have been separated? A. Yes. Q. Can you tell me give me a best judgment or best estimate of when of the periods that you've been separated from each other?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	 A. No. Q. Do you ever see him? A. Occasionally. Not a lot. Q. And where do your three children reside at the current time? A. They live with me. Q. And have each of them completed school or are they in school? A. Shereka is in college and Christopherboth the other two are still in school. Q. Seniors? A. Christopher is a senior this year and Demarcus is going to the ninth grade. Q. All right. Thank you. Have you had any other marriages other than to Mr. Cunningham and Mr. Stallings? A. No, sir. Q. And have you had any other children than the three children that you've talked about? A. No, sir. Q. Where were you born, Ms. Stallings?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. He works at a chemical plant. I don't know exactly what his job title is. Q. All right. What's the name of the chemical plant? A. Kerr Magee Chemicals. Q. Where is that located? A. In Hamilton, Mississippi. Q. And has Mr. Stallings been doing been working for that company since you married in 1996? A. Yes. Q. All right. Have the two of you continued to reside together continuously since your marriage? A. On and off. On and off. Q. On and off? A. Yes. Q. There have been periods of time that you all have been separated? A. Yes. Q. Can you tell me give me a best judgment or best estimate of when of the periods that you've been separated from each other? A. Just last year. It didn't last but about	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 A. No. Q. Do you ever see him? A. Occasionally. Not a lot. Q. And where do your three children reside at the current time? A. They live with me. Q. And have each of them completed school or are they in school? A. Shereka is in college and Christopherboth the other two are still in school. Q. Seniors? A. Christopher is a senior this year and Demarcus is going to the ninth grade. Q. All right. Thank you. Have you had any other marriages other than to Mr. Cunningham and Mr. Stallings? A. No, sir. Q. And have you had any other children than the three children that you've talked about? A. No, sir. Q. Where were you born, Ms. Stallings? A. Noxubee County.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. He works at a chemical plant. I don't know exactly what his job title is. Q. All right. What's the name of the chemical plant? A. Kerr Magee Chemicals. Q. Where is that located? A. In Hamilton, Mississippi. Q. And has Mr. Stallings been doing been working for that company since you married in 1996? A. Yes. Q. All right. Have the two of you continued to reside together continuously since your marriage? A. On and off. On and off. Q. On and off? A. Yes. Q. There have been periods of time that you all have been separated? A. Yes. Q. Can you tell me give me a best judgment or best estimate of when of the periods that you've been separated from each other? A. Just last year. It didn't last but about two months last year. I don't know what month. And	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 A. No. Q. Do you ever see him? A. Occasionally. Not a lot. Q. And where do your three children reside at the current time? A. They live with me. Q. And have each of them completed school or are they in school? A. Shereka is in college and Christopherboth the other two are still in school. Q. Seniors? A. Christopher is a senior this year and Demarcus is going to the ninth grade. Q. All right. Thank you. Have you had any other marriages other than to Mr. Cunningham and Mr. Stallings? A. No, sir. Q. And have you had any other children than the three children that you've talked about? A. No, sir. Q. Where were you born, Ms. Stallings? A. Noxubee County. Q. And your date of birth is?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	A. He works at a chemical plant. I don't know exactly what his job title is. Q. All right. What's the name of the chemical plant? A. Kerr Magee Chemicals. Q. Where is that located? A. In Hamilton, Mississippi. Q. And has Mr. Stallings been doing been working for that company since you married in 1996? A. Yes. Q. All right. Have the two of you continued to reside together continuously since your marriage? A. On and off. On and off. Q. On and off? A. Yes. Q. There have been periods of time that you all have been separated? A. Yes. Q. Can you tell me give me a best judgment or best estimate of when of the periods that you've been separated from each other? A. Just last year. It didn't last but about two months last year. I don't know what month. And about two years before then	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	 A. No. Q. Do you ever see him? A. Occasionally. Not a lot. Q. And where do your three children reside at the current time? A. They live with me. Q. And have each of them completed school or are they in school? A. Shereka is in college and Christopherboth the other two are still in school. Q. Seniors? A. Christopher is a senior this year and Demarcus is going to the ninth grade. Q. All right. Thank you. Have you had any other marriages other than to Mr. Cunningham and Mr. Stallings? A. No, sir. Q. And have you had any other children than the three children that you've talked about? A. No, sir. Q. Where were you born, Ms. Stallings? A. Noxubee County. Q. And your date of birth is? A. February 17, 1966.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. He works at a chemical plant. I don't know exactly what his job title is. Q. All right. What's the name of the chemical plant? A. Kerr Magee Chemicals. Q. Where is that located? A. In Hamilton, Mississippi. Q. And has Mr. Stallings been doing been working for that company since you married in 1996? A. Yes. Q. All right. Have the two of you continued to reside together continuously since your marriage? A. On and off. On and off. Q. On and off? A. Yes. Q. There have been periods of time that you all have been separated? A. Yes. Q. Can you tell me give me a best judgment or best estimate of when of the periods that you've been separated from each other? A. Just last year. It didn't last but about two months last year. I don't know what month. And	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 A. No. Q. Do you ever see him? A. Occasionally. Not a lot. Q. And where do your three children reside at the current time? A. They live with me. Q. And have each of them completed school or are they in school? A. Shereka is in college and Christopherboth the other two are still in school. Q. Seniors? A. Christopher is a senior this year and Demarcus is going to the ninth grade. Q. All right. Thank you. Have you had any other marriages other than to Mr. Cunningham and Mr. Stallings? A. No, sir. Q. And have you had any other children than the three children that you've talked about? A. No, sir. Q. Where were you born, Ms. Stallings? A. Noxubee County. Q. And your date of birth is?

Deposition of Brenda Stallings

Page 18 1 A. 587-25-9948. 2 Q. I'm sorry. Say that again, please. 3 A. 587-25-9948. 4 Q. Okay. Thank you. And you live in Macon at the present time? 6 A. Yes, sir. 7 Q. Do you live in an apartment or a house? 8 A. A house. 9 Q. Okay. Is it a single family residence? 10 A. What do you mean by that? 11 Q. Well, I'm asking is there any other family? Is there another part to the house? 13 A. Oh, single family, yes. 14 Q. Yes, I meant as opposed to a duplex or something like that. And do you own that home? 15 something like that. And do you own that home? 16 A. Yes, along with Jerry. 17 Q. You and your husband, Mr. Stallings? 18 A. Uh-huh. 19 Q. How long have you owned that home? 20 A. Seven years. 21 Q. And do your three children and wr. Stallings all live together in that home? 22 A. Yes, sir. 23 A. Yes, sir. 4 Q. What's the name of it? 8 A. Brenda's Cutting Edge. 9 Q. How long have you been operating that business? 10 business? 11 A. Five years. 12 Q. Does anybody else work in the business with you? 13 wishers. 14 Q. Or is it in downtown Macon? 2 A. The town is so small it's in downtown, yes. 4 Q. And do you operate your own hairstyling business? 6 A. Yes, sir. 7 Q. What's the name of it? 8 A. Brenda's Cutting Edge. 9 Q. How long have you been operating that business? 10 business? 11 A. Five years. 12 Q. Does anybody else work in the business with you? 13 A. No, sir. 14 A. No, sir. 15 Q. So on any given day. I only work on werking there it's just me. 16 Vedinesday through Saturday. So any day in between there it's just me. 20 A. Yes, sir. 21 Q. Anybody else? 22 A. That's it. 23 A. The town is so small it's in downtown, yes. 24 Q. And do you own that home? 25 A. I rented a booth out once, but about six months. 26 A. That didn't work out. 27 Q. And you told me that your usual schedule is Wednesday to Saturday? 28 A. Uh-huh. 29 Q. And do you know approximately how large is in the present file of the business? 39 Q. And do you how with the pressor. 39 Q. And do you how the hand you have you been operating t
2 Q. I'm sorry. Say that again, please. 3 A. 587-25-9948. 4 Q. Okay. Thank you. And you live in Macon at the present time? 6 A. Yes, sir. 7 Q. Do you live in an apartment or a house? 8 A. A house. 9 Q. Okay. Is it a single family residence? 10 A. What do you mean by that? 11 Q. Well, I'm asking is there any other 12 family? Is there another part to the house? 13 A. Oh, single family, yes. 14 Q. Yes. I meant as opposed to a duplex or something like that. And do you own that home? 15 something like that. And do you own that home? 16 A. Yes, sir. 9 Q. How long have you been operating that business? 11 A. Five years. 12 Q. Does anybody else work in the business with you? 13 A. No, sir. 14 Q. You and your husband, Mr. Stallings? 15 A. Ohe work in the business with you? 16 A. Yes, sir. 17 Q. Woll, I'm asking is there any other 18 A. Oh, single family, yes. 19 Q. You and your husband, Mr. Stallings? 10 A. Yes, along with Jerry. 11 A. No on any given day. I only work on working with you, other hairstylists? 12 Q. Anybody else? 13 A. Yes, sir. 14 A. No on any given day if I walked into your place of business I would find you and you alone working business? 15 A. No on any given day. I only work on working with you, other hairstylists? 16 A. I rented a booth out once, but about six months. 17 Q. All right. Have you ever had people working with you, other hairstylists? 18 A. That didn't work out. 19 Q. Is it a one-story home or 20 A. One story. 21 Q. Is it a one-story home or 22 A. One story. 23 A. One story. 34 A. That didn't work out. 25 Q. And do you know approximately how large is wednesday to Saturday? 4 A. Uh-huh. 5 D. Walt are your hours of operating that business? 4 Q. And you told me that your usual schedule is Wednesday to Saturday? 4 A. Uh-huh. 5 Q. What's the name of it? A. Five years. C. Q. Does anybody else work in the business with you? A. No, on any given day if I walked into your place of business I would find you and you alone working there? A. Not on any given day if I walked into your place o
A. 587-25-9948. Q. Okay. Thank you. And you live in Macon at the present time? A. Yes, sir. Q. Do you live in an apartment or a house? A. A house. Q. Okay. Is it a single family residence? A. What do you mean by that? Q. Well, I'm asking is there any other amily? Is there another part to the house? A. Oh, single family, yes. Q. Yes. I meant as opposed to a duplex or something like that. And do you own that home? A. Yes, along with Jerry. Q. You and your husband, Mr. Stallings? A. Uh-huh. Q. How long have you owned that home? A. Seven years. Q. And do you rthree children and Mr. Stallings all live together in that home? A. Yes, sir. Q. Anybody else? A. That's it. A. One story. A. No. Just three bedrooms and two baths is A. Whouse in an apartment or a house? A. Yes, sir. Q. What's the name of it? A. Yes, sir. Q. What's the name of it? A. Yes, sir. Q. What's the name of it? A. Yes, sir. Q. How long have you been operating that business? A. No. So on any given day if I walked into your place of business I would find you and you alone working there? A. Not on any given day. I only work on Wednesday through Saturday. So any day in between there it's just me. Q. All right. Have you ever had people working with you, other hairstylists? A. I rented a booth out once, but about six months. Q. One story. Q. And do you know approximately how large it is? A. Uh-huh. Q. What are your hours of operation during
4 Q. Okay. Thank you. And you live in Macon at the present time? 6 A. Yes, sir. 7 Q. Do you live in an apartment or a house? 8 A. A house. 9 Q. Okay. Is it a single family residence? 10 A. What do you mean by that? 11 Q. Well, I'm asking is there any other 12 family? Is there another part to the house? 13 A. Oh, single family, yes. 14 Q. Yes. I meant as opposed to a duplex or something like that. And do you own that home? 15 something like that. And do you own that home? 16 A. Yes, sir. 7 Q. Well, I'm asking is there any other 17 something like that. And do you own that home? 18 A. Uh-huh. 19 Q. You and your husband, Mr. Stallings? 18 A. Uh-huh. 19 Q. How long have you owned that home? 20 A. Seven years. 21 Q. And do your three children and 22 Mr. Stallings all live together in that home? 23 A. Yes, sir. 24 Q. Anybody else? 25 A. That's it. 26 Q. And you know approximately how large it is? 27 A. No. Just three bedrooms and two baths is
5 at the present time? 6 A. Yes, sir. 7 Q. Do you live in an apartment or a house? 8 A. A house. 9 Q. Okay. Is it a single family residence? 10 A. What do you mean by that? 11 Q. Well, I'm asking is there any other 12 family? Is there another part to the house? 13 A. Oh, single family, yes. 14 Q. Yes. I meant as opposed to a duplex or 15 something like that. And do you own that home? 16 A. Yes, along with Jerry. 17 Q. You and your husband, Mr. Stallings? 18 A. Uh-huh. 19 Q. How long have you owned that home? 19 Q. And do your three children and 20 Mr. Stallings all live together in that home? 21 A. Yes, sir. 22 Q. Anybody else? 23 A. Yes, sir. 24 Q. Anybody else? 25 A. That's it. 26 business? 6 A. Yes, sir. 7 Q. What's the name of it? 8 A. Brenda's Cutting Edge. 9 Q. How long have you been operating that business? 11 A. Five years. 12 Q. Does anybody else work in the business with you? 14 A. No, sir. 15 Q. So on any given day if I walked into your place of business I would find you and you alone working there? 18 A. Not on any given day. I only work on Wednesday through Saturday. So any day in between there it's just me. 20 A. Yes, sir. 21 Q. And do your three children and 22 Working with you, other hairstylists? 23 A. That's it. 25 Q. Okay. That didn't work out. 26 A. That didn't work out. 27 Q. And you told me that your usual schedule is Wednesday to Saturday? 28 A. That didn't work out. 29 And do you know approximately how large is Wednesday to Saturday? 4 It is? 4 A. What are your hours of operation during
6 A. Yes, sir. 7 Q. Do you live in an apartment or a house? 8 A. A house. 9 Q. Okay. Is it a single family residence? 10 A. What do you mean by that? 11 Q. Well, I'm asking is there any other 12 family? Is there another part to the house? 13 A. Oh, single family, yes. 14 Q. Yes. I meant as opposed to a duplex or 15 something like that. And do you own that home? 16 A. Yes, along with Jerry. 17 Q. You and your husband, Mr. Stallings? 18 A. Uh-huh. 19 Q. How long have you owned that home? 20 A. Seven years. 21 Q. And do your three children and 22 Mr. Stallings all live together in that home? 23 A. Yes, sir. 24 Q. Anybody else? 25 A. That's it. 6 A. Yes, sir. 7 Q. What's the name of it? 8 A. How long have you been operating that business? 10 business? 11 A. Five years. 12 Q. Does anybody else work in the business with you, offer day if I walked into your place of business I would find you and you alone working there? 18 A. Not on any given day if I walked into your place of business I would find you and you alone working there? 19 A. Not on any given day. I only work on Wednesday through Saturday. So any day in between there it's just me. 10 Does anybody else work in the business with you working there? 11 A. Not on any given day if I walked into your place of business I would find you and you alone working there? 12 A. Not on any given day. I only work on Wednesday through Saturday. So any day in between there it's just me. 12 Q. And do your three children and your day in between there it's just me. 13 A. I rented a booth out once, but about six months. 14 A. That didn't work out. 15 Q. And you told me that your usual schedule is Wednesday to Saturday? 16 A. That didn't work out. 17 A. That didn't work out. 18 A. That didn't work out. 19 Q. And you told me that your usual schedule is Wednesday to Saturday? 10 A. That didn't work out. 21 Q. And you told me that your usual schedule is Wednesday to Saturday? 11 A. That didn't work out. 22 Q. And you told me that your usual schedule is Wednesday to Saturday? 11 A.
7 Q. Do you live in an apartment or a house? 8 A. A house. 9 Q. Okay. Is it a single family residence? 10 A. What do you mean by that? 11 Q. Well, I'm asking is there any other 12 family? Is there another part to the house? 13 A. Oh, single family, yes. 14 Q. Yes. I meant as opposed to a duplex or 15 something like that. And do you own that home? 16 A. Yes, along with Jerry. 17 Q. You and your husband, Mr. Stallings? 18 A. Uh-huh. 19 Q. How long have you been operating that business? 10 A. Five years. 11 A. Five years. 12 Q. Does anybody else work in the business with you? 14 A. No, sir. 15 Q. So on any given day if I walked into your place of business I would find you and you alone working there? 18 A. Not on any given day. I only work on 19 Wednesday through Saturday. So any day in between there it's just me. 20 A. Seven years. 21 Q. And do your three children and 22 Mr. Stallings all live together in that home? 23 A. Yes, sir. 24 Q. Anybody else? 25 A. That's it. Page 19 1 Q. Is it a one-story home or 2 A. One story. 3 Q. And do you know approximately how large 4 it is? 5 A. No. Just three bedrooms and two baths is 7 Q. What's the name of it? 8 A. Brenda's Cutting Edge. Q. How long have you been operating that business? 9 Q. How long have you been operating that business? 10 A. Five years. 12 Q. Does anybody else work in the business with you? 14 A. No, sir. 15 Q. So on any given day. I only work on 19 Wednesday through Saturday. So any day in between there it's just me. 20 Q. All right. Have you ever had people working with you, other hairstylists? 21 A. I rented a booth out once, but about six months. 22 Q. Okay. That didn't work out. 23 Q. And you told me that your usual schedule is Wednesday to Saturday? 4 A. Uh-huh. 5 Q. What are your hours of operation during
8 A. A house. 9 Q. Okay. Is it a single family residence? 10 A. What do you mean by that? 11 Q. Well, I'm asking is there any other 12 family? Is there another part to the house? 13 A. Oh, single family, yes. 14 Q. Yes. I meant as opposed to a duplex or 15 something like that. And do you own that home? 16 A. Yes, along with Jerry. 17 Q. You and your husband, Mr. Stallings? 18 A. Uh-huh. 19 Q. How long have you owned that home? 20 A. Seven years. 21 Q. And do your three children and 22 Mr. Stallings all live together in that home? 23 A. Yes, sir. 24 Q. Anybody else? 25 A. That's it. Page 19 1 Q. Is it a one-story home or 2 A. One story. 3 Q. And do you know approximately how large 4 it is? 5 A. No. Just three bedrooms and two baths is 8 A. Brenda's Cutting Edge. 9 Q. How long have you been operating that business? 10 A. Brive years. 11 A. Five years. 12 Q. Does anybody else work in the business with you? 14 A. No, sir. 15 Q. So on any given day if I walked into your place of business I would find you and you alone working there? 18 A. Not on any given day. I only work on 19 Wednesday through Saturday. So any day in between there it's just me. 20 Q. All right. Have you ever had people working with you, other hairstylists? 21 A. That didn't work out. 22 Q. Okay. That didn't work out. 23 A. Oh, single family, yes. 14 A. Five years. 15 Q. Does anybody else work in the business with you? 16 A. No, sir. 17 Q. So on any given day if I walked into your place of business I would find you and you alone working there? 18 A. Not on any given day. I only work on 19 Wednesday through Saturday. So any day in between there it's just me. 20 Q. All right. Have you ever had people working with you, other hairstylists? 21 A. That didn't work out. 22 Q. Okay. That didn't work out. 23 A. Uh-huh. 24 A. Uh-huh. 25 Q. What are your hours of operation during
9 Q. Okay. Is it a single family residence? 10 A. What do you mean by that? 11 Q. Well, I'm asking is there any other 12 family? Is there another part to the house? 13 A. Oh, single family, yes. 14 Q. Yes. I meant as opposed to a duplex or 15 something like that. And do you own that home? 16 A. Yes, along with Jerry. 17 Q. You and your husband, Mr. Stallings? 18 A. Uh-huh. 19 Q. How long have you been operating that 10 business? 11 A. Five years. 12 Q. Does anybody else work in the business 13 with you? 14 A. No, sir. 15 Q. So on any given day if I walked into your place of business I would find you and you alone working there? 16 A. Seven years. 17 working there? 18 A. Not on any given day. I only work on 19 Wednesday through Saturday. So any day in between there it's just me. 20 A. Seven years. 21 Q. And do your three children and 22 Mr. Stallings all live together in that home? 23 A. Yes, sir. 24 Q. Anybody else? 25 A. That's it. 26 Q. Okay. That didn't work out. 27 A. One story. 3 Q. And do you know approximately how large 4 it is? 4 A. No. Just three bedrooms and two baths is 5 Q. What are your hours of operating that business? 4 Lone lone lone work in the business 10 A. Five years. 12 Q. Does anybody else work in the business 11 A. Five years. 12 Q. Does anybody else work in the business 12 Q. So on any given day if I walked into your place of business I would find you and you alone working there? 15 Q. So on any given day if I walked into your place of business I would find you and you alone working the vole. 16 A. No any given day if I walked into your place of business I would find you and you alone working the vole. 17 Q. So on any given day if I walked into your place of business I would find you and you alone working there? 22 Q. So on any given day if I walked into your place of business I would find you and you alone working there? 23 A. I rented a booth out once, but about six months. 24 Q. And you told me that your usual schedule is Wednesday to Saturday? 25 A. Uh-huh. 26 Q. And you told me t
10 A. What do you mean by that? 11 Q. Well, I'm asking is there any other 12 family? Is there another part to the house? 13 A. Oh, single family, yes. 14 Q. Yes. I meant as opposed to a duplex or 15 something like that. And do you own that home? 16 A. Yes, along with Jerry. 17 Q. You and your husband, Mr. Stallings? 18 A. Uh-huh. 19 Q. How long have you owned that home? 20 A. Seven years. 21 Q. And do your three children and 22 Mr. Stallings all live together in that home? 23 A. Yes, sir. 24 Q. Anybody else? 25 A. That's it. Page 19 1 Q. Is it a one-story home or 2 A. One story. 3 Q. And do you know approximately how large 4 it is? 5 A. No. Just three bedrooms and two baths is 10 business? 11 A. Five years. 12 Q. Does anybody else work in the business 11 A. Five years. 12 Q. Does anybody else work in the business 11 A. Five years. 12 Q. Does anybody else work in the business 12 Q. So on any given day if I walked into your place of business I would find you and you alone 14 A. No, sir. 15 Q. So on any given day if I walked into your place of business I would find you and you alone 16 Working there? 18 A. No on any given day. I only work on 19 Wednesday through Saturday. So any day in between there it's just me. 20 Q. All right. Have you ever had people 21 Working with you, other hairstylists? 22 A. I rented a booth out once, but about six months. 23 Q. Okay. That didn't work out. 24 Q. And you told me that your usual schedule 25 Q. And you told me that your usual schedule 26 A. Uh-huh. 27 A. That didn't work out. 28 Q. And you told me that your usual schedule 29 A. Uh-huh. 20 And do you know approximately how large 30 A. Ves, sir. 31 A. That didn't work out. 31 A. That didn't work out. 32 Q. And you told me that your usual schedule 33 is Wednesday to Saturday? 44 A. Uh-huh. 55 Q. What are your hours of operation during
11 Q. Well, I'm asking is there any other 12 family? Is there another part to the house? 13 A. Oh, single family, yes. 14 Q. Yes. I meant as opposed to a duplex or 15 something like that. And do you own that home? 16 A. Yes, along with Jerry. 17 Q. You and your husband, Mr. Stallings? 18 A. Uh-huh. 19 Q. How long have you owned that home? 20 A. Seven years. 21 Q. And do your three children and 22 Mr. Stallings all live together in that home? 23 A. Yes, sir. 24 Q. Anybody else? 25 A. That's it. Page 19 1 Q. Is it a one-story home or 2 A. One story. 3 Q. And do you know approximately how large 4 it is? 5 A. No. Just three bedrooms and two baths is 11 A. Five years. 20 Does anybody else work in the business 12 Q. Does anybody else work in the business 13 with you? 14 A. No, sir. 15 Q. So on any given day if I walked into your or the place of business I would find you and you alone working there? 18 A. Not on any given day. I only work on 19 Wednesday through Saturday. So any day in between there it's just me. 20 Q. All right. Have you ever had people work in the business 21 Q. Does anybody else work in the business 22 Q. Does anybody else work in the business 23 with you? 24 A. No, sir. 25 Q. So on any given day. I only work on 26 A. Not on any given day. I only work on 27 Wednesday through Saturday. So any day in between there it's just me. 28 Q. All right. Have you ever had people working there? 29 A. I rented a booth out once, but about six months. 20 Q. Okay. That didn't work out. 21 Q. And you told me that your usual schedule with it is is wednesday to Saturday? 22 Q. And you told me that your usual schedule with it is is Wednesday to Saturday? 23 A. Uh-huh. 24 A. No, Just three bedrooms and two baths is
family? Is there another part to the house? A. Oh, single family, yes. Q. Yes. I meant as opposed to a duplex or something like that. And do you own that home? A. Yes, along with Jerry. Q. You and your husband, Mr. Stallings? A. Uh-huh. Q. How long have you owned that home? A. Seven years. Q. And do your three children and Mr. Stallings all live together in that home? A. Yes, sir. A. Yes, sir. A. That's it. Page 19 Q. Is it a one-story home or A. One story. A. No. Just three bedrooms and two baths is Q. What are your hours of operation during A. No, sir. Q. So on any given day if I walked into your place of business I would find you and you alone With you? A. No, sir. Q. So on any given day if I walked into your place of business I would find you and you alone Working there? A. Not on any given day. I only work on 19 Wednesday through Saturday. So any day in between there it's just me. 20 All right. Have you ever had people Working with you, other hairstylists? A. I rented a booth out once, but about six months. Q. Okay. That didn't work out. A. That didn't work out. Q. And you told me that your usual schedule is Wednesday to Saturday? A. Uh-huh. Seven years. Q. And you told me that your usual schedule is Wednesday to Saturday? A. I had didn't work out. Q. And you told me that your usual schedule is Wednesday to Saturday? A. Uh-huh. A. No. That didn't work out. Q. And you told me that your usual schedule is Wednesday to Saturday? A. Uh-huh. A. No. Just three bedrooms and two baths is
13 A. Oh, single family, yes. 14 Q. Yes. I meant as opposed to a duplex or 15 something like that. And do you own that home? 16 A. Yes, along with Jerry. 17 Q. You and your husband, Mr. Stallings? 18 A. Uh-huh. 19 Q. How long have you owned that home? 20 A. Seven years. 21 Q. And do your three children and 22 Mr. Stallings all live together in that home? 23 A. Yes, sir. 24 Q. Anybody else? 25 A. That's it. Page 19 1 Q. Is it a one-story home or 2 A. One story. 3 Q. And do you know approximately how large 4 it is? 5 A. No. Just three bedrooms and two baths is 13 with you? 14 A. No, sir. 15 Q. So on any given day if I walked into your place of business I would find you and you alone 16 working there? 18 A. Not on any given day. I only work on 19 Wednesday through Saturday. So any day in between there it's just me. 21 Q. All right. Have you ever had people working with you, other hairstylists? 23 A. I rented a booth out once, but about six months. 25 Q. Okay. That didn't work out. 2 Q. And you told me that your usual schedule is Wednesday to Saturday? 4 A. Uh-huh. 5 Q. What are your hours of operation during
14 Q. Yes. I meant as opposed to a duplex or something like that. And do you own that home? 15 something like that. And do you own that home? 16 A. Yes, along with Jerry. 17 Q. You and your husband, Mr. Stallings? 18 A. Uh-huh. 19 Q. How long have you owned that home? 20 A. Seven years. 21 Q. And do your three children and 22 Mr. Stallings all live together in that home? 22 Mr. Stallings all live together in that home? 23 A. Yes, sir. 24 Q. Anybody else? 25 A. That's it. Page 19 1 Q. Is it a one-story home or 2 A. One story. 3 Q. And do you know approximately how large 4 it is? 5 A. No. Just three bedrooms and two baths is
something like that. And do you own that home? A. Yes, along with Jerry. Q. You and your husband, Mr. Stallings? A. Uh-huh. Q. How long have you owned that home? A. Seven years. Q. And do your three children and Mr. Stallings all live together in that home? A. Yes, sir. A. That's it. Page 19 Q. Is it a one-story home or A. One story. Q. And do you know approximately how large 4 it is? A. Not on any given day. I only work on working there? 10 Wednesday through Saturday. So any day in between there it's just me. 20 Working with you, other hairstylists? A. I rented a booth out once, but about six months. 22 Q. And you told me that your usual schedule is Wednesday to Saturday? A. That didn't work out. Q. And you told me that your usual schedule is Wednesday to Saturday? A. Uh-huh. D. What are your hours of operation during
16 A. Yes, along with Jerry. 17 Q. You and your husband, Mr. Stallings? 18 A. Uh-huh. 19 Q. How long have you owned that home? 20 A. Seven years. 21 Q. And do your three children and 22 Mr. Stallings all live together in that home? 23 A. Yes, sir. 24 Q. Anybody else? 25 A. That's it. Page 19 1 Q. Is it a one-story home or 2 A. One story. 3 Q. And do you know approximately how large 4 it is? 5 A. No. Just three bedrooms and two baths is 16 place of business I would find you and you alone working there? 18 A. Not on any given day. I only work on 19 Wednesday through Saturday. So any day in between 20 there it's just me. 21 Q. All right. Have you ever had people working with you, other hairstylists? 22 A. I rented a booth out once, but about 23 six months. 24 Six months. 25 Q. Okay. That didn't work out? Page 21 A. That didn't work out. 2 Q. And you told me that your usual schedule 3 is Wednesday to Saturday? 4 A. Uh-huh. 5 Q. What are your hours of operation during
17 Q. You and your husband, Mr. Stallings? 18 A. Uh-huh. 19 Q. How long have you owned that home? 20 A. Seven years. 21 Q. And do your three children and 22 Mr. Stallings all live together in that home? 23 A. Yes, sir. 24 Q. Anybody else? 25 A. That's it. Page 19 1 Q. Is it a one-story home or 2 A. One story. 3 Q. And do you know approximately how large 4 it is? 5 A. Not on any given day. I only work on 19 Wednesday through Saturday. So any day in between 20 there it's just me. 21 Q. All right. Have you ever had people 22 working with you, other hairstylists? 23 A. I rented a booth out once, but about 24 six months. 25 Q. Okay. That didn't work out? Page 19 A. That didn't work out. 2 Q. And you told me that your usual schedule 3 is Wednesday to Saturday? 4 A. Uh-huh. 5 Q. What are your hours of operation during
18 A. Uh-huh. 19 Q. How long have you owned that home? 20 A. Seven years. 21 Q. And do your three children and 22 Mr. Stallings all live together in that home? 23 A. Yes, sir. 24 Q. Anybody else? 25 A. That's it. Page 19 1 Q. Is it a one-story home or 2 A. One story. 3 Q. And do you know approximately how large 4 it is? 5 A. No. Just three bedrooms and two baths is 18 A. Not on any given day. I only work on 19 Wednesday through Saturday. So any day in between 20 there it's just me. 21 Q. All right. Have you ever had people 22 working with you, other hairstylists? 23 A. I rented a booth out once, but about 24 six months. 25 Q. Okay. That didn't work out? Page 21 A. That didn't work out. 2 Q. And you told me that your usual schedule 3 is Wednesday to Saturday? 4 A. Uh-huh. 5 Q. What are your hours of operation during
19 Q. How long have you owned that home? 20 A. Seven years. 21 Q. And do your three children and 22 Mr. Stallings all live together in that home? 23 A. Yes, sir. 24 Q. Anybody else? 25 A. That's it. Page 19 1 Q. Is it a one-story home or 2 A. One story. 3 Q. And do you know approximately how large 4 it is? 5 A. No. Just three bedrooms and two baths is 19 Wednesday through Saturday. So any day in between there it's just me. 20 there it's just me. 20 working with you, other hairstylists? 21 Q. All right. Have you ever had people working with you, other hairstylists? 22 A. I rented a booth out once, but about six months. 23 Q. And do you know approximately how large 4 it is? 4 A. Uh-huh. 5 Q. What are your hours of operation during
20 A. Seven years. 21 Q. And do your three children and 22 Mr. Stallings all live together in that home? 23 A. Yes, sir. 24 Q. Anybody else? 25 A. That's it. 20 there it's just me. 21 Q. All right. Have you ever had people 22 working with you, other hairstylists? 23 A. I rented a booth out once, but about 24 six months. 25 Q. Okay. That didn't work out? Page 19 1 Q. Is it a one-story home or 2 A. One story. 3 Q. And do you know approximately how large 4 it is? 5 A. No. Just three bedrooms and two baths is 20 there it's just me. 21 Q. All right. Have you ever had people 22 working with you, other hairstylists? 23 A. I rented a booth out once, but about 24 six months. 25 Q. Okay. That didn't work out. 2 Q. And you told me that your usual schedule 3 is Wednesday to Saturday? 4 A. Uh-huh. 5 Q. What are your hours of operation during
Q. And do your three children and Mr. Stallings all live together in that home? A. Yes, sir. Q. Anybody else? A. That's it. Page 19 Q. And you ever had people working with you, other hairstylists? A. I rented a booth out once, but about six months. Q. Okay. That didn't work out? Page 21 A. That didn't work out. Q. And you told me that your usual schedule is Wednesday to Saturday? A. Uh-huh. A. No. Just three bedrooms and two baths is Q. What are your hours of operation during
22 Mr. Stallings all live together in that home? 23 A. Yes, sir. 24 Q. Anybody else? 25 A. That's it. 26 Page 19 1 Q. Is it a one-story home or 2 A. One story. 3 Q. And do you know approximately how large 4 it is? 4 Ir ented a booth out once, but about 24 six months. 25 Q. Okay. That didn't work out? Page 19 1 A. That didn't work out. 2 Q. And you told me that your usual schedule 3 is Wednesday to Saturday? 4 A. Uh-huh. 5 A. No. Just three bedrooms and two baths is 5 Q. What are your hours of operation during
A. Yes, sir. Q. Anybody else? A. That's it. Page 19 Q. Is it a one-story home or A. One story. Q. And do you know approximately how large 4 it is? A. No. Just three bedrooms and two baths is A. I rented a booth out once, but about 24 six months. D. Q. Okay. That didn't work out? A. That didn't work out. Q. And you told me that your usual schedule 3 is Wednesday to Saturday? A. Uh-huh. D. What are your hours of operation during
24 Q. Anybody else? 25 A. That's it. Page 19 1 Q. Is it a one-story home or 2 A. One story. 3 Q. And do you know approximately how large 4 it is? 4 No. Just three bedrooms and two baths is 24 six months. 25 Q. Okay. That didn't work out? Page 19 1 A. That didn't work out. 2 Q. And you told me that your usual schedule 3 is Wednesday to Saturday? 4 A. Uh-huh. 5 Q. What are your hours of operation during
25 Q. Okay. That didn't work out? Page 19 1 Q. Is it a one-story home or 2 A. One story. 3 Q. And do you know approximately how large 4 it is? 5 A. No. Just three bedrooms and two baths is Page 19 1 A. That didn't work out. 2 Q. And you told me that your usual schedule 3 is Wednesday to Saturday? 4 A. Uh-huh. 5 Q. What are your hours of operation during
Page 19 1 Q. Is it a one-story home or 2 A. One story. 3 Q. And do you know approximately how large 4 it is? 5 A. No. Just three bedrooms and two baths is Page 19 1 A. That didn't work out. 2 Q. And you told me that your usual schedule 3 is Wednesday to Saturday? 4 A. Uh-huh. 5 Q. What are your hours of operation during
1 Q. Is it a one-story home or 2 A. One story. 3 Q. And do you know approximately how large 4 it is? 4 No. Just three bedrooms and two baths is 1 A. That didn't work out. 2 Q. And you told me that your usual schedule 3 is Wednesday to Saturday? 4 A. Uh-huh. 5 Q. What are your hours of operation during
1 Q. Is it a one-story home or 2 A. One story. 3 Q. And do you know approximately how large 4 it is? 4 No. Just three bedrooms and two baths is 1 A. That didn't work out. 2 Q. And you told me that your usual schedule 3 is Wednesday to Saturday? 4 A. Uh-huh. 5 Q. What are your hours of operation during
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4 it is? 4 A. Uh-huh. 5 A. No. Just three bedrooms and two baths is 5 Q. What are your hours of operation during
5 A. No. Just three bedrooms and two baths is 5 Q. What are your hours of operation during
the same of the sa
6 all I can tell you. 6 those days?
7 Q. All right. Thank you. Have you ever 7 A. Nine to 5:30.
8 lived outside of Macon County? 8 Q. What did you do before you started
9 A. No. 9 operating your hairstyling place?
10 Q. So you were born and raised there and 10 A. I drove a school bus for Noxubee County
11 live there today. It's where you've lived your 11 School System and worked at the Junior Food Mart. 12 whole life? 12 And what else did I do. Angle's Restaurant.
C
i i i i i i i i i i i i i i i i i i i
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
, , , , , , , , , , , , , , , , , , ,
j j i i i i i i i i i i i i i i i i i i
p symmetric transfer operation your
19 A. Uh-huh. 19 current hairstyling business for approximately five 20 Q. And where is your place of business? 20 years?
20 Q. And where is your place of business? 20 years? 21 A. It's in Macon, Mississippi. 21 A. Uh-huh.
laa
22 Q. Is it in it's not at your home, is it? 22 Q. All right. And so would that mean that 23 A. No. It's like a mile from my house. 23 you started sometime in approximately 1999?
24 Q. Is it close to the downtown area? 24 A. Well, that was my own business five years
25 A. Yes, sir. 25 ago, but I did have previously at another salon I
25 ago, but I did nave previously at another Salon I

Deposition of Brenda Stallings

		T	
	Page 22		Page 24
1	just rented a booth. That was from oh, God,	1	Q. And I hear you're telling me that she was
2	these dates are going to be way out there. '92 to	- 2	the only one there for a while, but that's
3	'96, I believe, or '97.	3	suggesting that maybe someone else came and worked
4	Q. All right. And that's when you started	4	there at some point.
	your own business?	1	·
5	•	5	A. Not while I was there.
6	A. I started my own business in '99.	6	Q. Okay.
7	Q. Okay.	7	A. Maybe I phrased it wrong.
8	A. So any dates between from '92 in	8	Q. I got you. All right.
9	between that's where I was because I left one shop	9	 A. It was just me and her during that time.
10	and went immediately into my own. So the dates in	10	Q. Well, good. That's what I want you to do
11	between there.	11	is listen carefully to me to my questions.
12	Q. So you were a hairstylist in someone	12	A. Okay.
13	else's place of business. You had a booth in	13	Q. And it sounds like you're doing that.
14	someone else's place of business from approximately	14	All right. And before working at the place owned by
15	1992 until you started your own business in	15	Ms. Johnson in approximately 1992, you worked where?
16	approximately 1999?	16	A. Mayfair Apartments. I worked there seven
17	A. Yes.	17	
		1	years.
18	Q. Where was the place that you worked	18	Q. What did you do for them?
19	from '92? And I know you're using that as an	19	A. I was a resident manager.
20	approximate date.	20	Q. All right. And where are the Mayfair
21	A. Uh-huh.	21	Apartments located?
22	Q. Where was the place that you worked	22	A. It's in Macon.
23	from '92 to '99?	23	Q. Who was the person that you worked for
24	A. It's in Macon also.	24	when you worked for Mayfair Apartments?
25	Q. What's the name of it?	25	A. Hughes Management.
1		1	1 2 2 2
1	Page 23		Page 25
1	Page 23 A It was 11 Beauty Salon	1	Page 25 O Okay That was the company that managed
1 2	A. It was JJ Beauty Salon.	1 2	Q. Okay. That was the company that managed
2	A. It was JJ Beauty Salon.Q. And who was the owner of that?	2	Q. Okay. That was the company that managed the apartment complex?
2	A. It was JJ Beauty Salon.Q. And who was the owner of that?A. Katherine Johnson.	2	Q. Okay. That was the company that managed the apartment complex? A. Yes.
2 3 4	A. It was JJ Beauty Salon.Q. And who was the owner of that?A. Katherine Johnson.Q. And did Ms. Johnson also work at the	2 3 4	Q. Okay. That was the company that managed the apartment complex?A. Yes.Q. And was there a particular person at
2 3 4 5	A. It was JJ Beauty Salon.Q. And who was the owner of that?A. Katherine Johnson.Q. And did Ms. Johnson also work at the beauty salon?	2 3 4 5	Q. Okay. That was the company that managed the apartment complex? A. Yes. Q. And was there a particular person at Hughes Management that you reported to?
2 3 4 5 6	 A. It was JJ Beauty Salon. Q. And who was the owner of that? A. Katherine Johnson. Q. And did Ms. Johnson also work at the beauty salon? A. No. 	2 3 4 5 6	Q. Okay. That was the company that managed the apartment complex? A. Yes. Q. And was there a particular person at Hughes Management that you reported to? A. Oh, yes. Matthew Turner.
2 3 4 5 6 7	 A. It was JJ Beauty Salon. Q. And who was the owner of that? A. Katherine Johnson. Q. And did Ms. Johnson also work at the beauty salon? A. No. Q. She just owned it and other people came 	2 3 4 5 6 7	Q. Okay. That was the company that managed the apartment complex? A. Yes. Q. And was there a particular person at Hughes Management that you reported to? A. Oh, yes. Matthew Turner. Q. Where was he located?
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	Page 26		Page 28
1	A. Uh-huh.	1	that correct?
2	Q. And did that well, let's I was	2	A. Uh-huh. Yes.
3	trying to establish dates. So let's see if we can	3	Q. And how long did you drive a bus for
4	do this. You worked for Mayfair and Hughes	4	Noxubee County Schools?
5	Management approximately seven years?	5	A. Three years.
	A. Uh-huh.	6	-
6		7	Q. Three years? A. Uh-huh.
7	Q. So does that take us back to about 1985?		·
8	A. Uh-huh.	8	Q. And what was the who was I'm sorry.
9	Q. And then you before that you were	9	Who was the person that you worked for at the
10	working as a bus driver for the Macon County	10	Noxubee County Schools?
11	Schools?	11	A. Who was the person? You want to know who
12	A. Right. I think I went too far back when	12	the supervisor was?
13	I said '85. That's the year I graduated. These	13	Q. Yes.
14	dates are going to mess me up. I started working	14	A. Is that what you're asking? Okay.
15	for the Noxubee County School System in 1987 and I	15	Charlie Conner.
16	started working for Mayfair Apartments also in	16	Q. Charlie Conner?
17	1987. I worked both jobs.	17	A. Uh-huh.
18	Q. I see.	18	Q. And did you run a route in the morning
19	A. Yes.	19	and then again in the afternoon?
20	Q. Okay.	20	A. Uh-huh.
21	A. And	21	Q. What was the reason for your stopping
22	Q. Go ahead.	22	work for Noxubee County Schools?
23	A. And Junior Food Mart. Add that in in	23	A. It was beginning to interfere with my
24	1988.	24	
25			hours at the other job.
23	Q. So were you working at all three places	25	Q. Okay. And which job was it interfering
	D 27		
1	Page 27 for some period of time?	,	Page 29 with?
2	A. Yes.	1 2	
3		2	A. Mayfair.
1	•	3	Q. I see. And so you voluntarily resigned
4	A. Uh-huh. Junior Food Mart.	4	from the Noxubee County Schools?
5	Q. The Junior Food Mart which is located	5	A. Yes, sir.
6	where?	6	Q. And just let's just be sure of this if
7	A. In Macon.	7	we can. What years were you driving for them?
8	Q. In Macon. And also for the management	8	A. '87. '87.
9	company?	9	Q. '87 to '90 approximately?
10	A. Yes.	10	A. Yes.
11	MR. WIENER: I tell you what I'd like to	11	Q. Okay. And the Junior Food Mart located
12	do is take about a two-minute break. I've got	12	in Macon?
13	10:36. Why don't we has everybody got that as	13	A. Uh-huh.
14	their time? I may be wrong. I've got about 10:37.	14	Q. What kind of work did you do for them?
15	And why don't we come back at about 10:40. Is that	15	A. Just cashier.
16	okay with everybody?	16	Q. Cashier?
17	MP DODGEV: That's fina	17	A. Uh-huh.
	MIR. DURSET: HIGES HITE.		
ΙTΩ	MR. DORSEY: That's fine. (OFF THE RECORD.)		O. And how long did you work for Junior Food 1
18 19	(OFF THE RECORD.)	18	Q. And how long did you work for Junior Food
19	(OFF THE RECORD.) MR. WIENER:	18 19	Mart?
19 20	(OFF THE RECORD.) MR. WIENER: Q. Ms. Stallings, before we broke I was	18 19 20	Mart? A. About a year and a half.
19 20 21	(OFF THE RECORD.) MR. WIENER: Q. Ms. Stallings, before we broke I was asking you about your employment history, and I	18 19 20 21	Mart? A. About a year and a half. Q. Who was your supervisor there?
19 20 21 22	(OFF THE RECORD.) MR. WIENER: Q. Ms. Stallings, before we broke I was asking you about your employment history, and I think you were telling me that back in approximately	18 19 20 21 22	Mart? A. About a year and a half. Q. Who was your supervisor there? A. I don't remember who the supervisor was.
19 20 21 22 23	(OFF THE RECORD.) MR. WIENER: Q. Ms. Stallings, before we broke I was asking you about your employment history, and I think you were telling me that back in approximately 1985 that that time period you were working for	18 19 20 21 22 23	Mart? A. About a year and a half. Q. Who was your supervisor there? A. I don't remember who the supervisor was. They went through so many I can't remember who it
19 20 21 22 23 24	(OFF THE RECORD.) MR. WIENER: Q. Ms. Stallings, before we broke I was asking you about your employment history, and I think you were telling me that back in approximately 1985 that that time period you were working for three employers simultaneously: Junior Food Mart,	18 19 20 21 22 23 24	Mart? A. About a year and a half. Q. Who was your supervisor there? A. I don't remember who the supervisor was. They went through so many I can't remember who it was at the time.
19 20 21 22 23	(OFF THE RECORD.) MR. WIENER: Q. Ms. Stallings, before we broke I was asking you about your employment history, and I think you were telling me that back in approximately 1985 that that time period you were working for	18 19 20 21 22 23	Mart? A. About a year and a half. Q. Who was your supervisor there? A. I don't remember who the supervisor was. They went through so many I can't remember who it